



Control Number: 49189



Item Number: 136

Addendum StartPage: 0

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

2019 OCT 12 PM 1:57

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

**CITY OF AUSTIN D/B/A AUSTIN WATER'S
SUPPLEMENTAL RESPONSE TO DISTRICTS' SIXTH REQUEST FOR
INFORMATION, QUESTIONS 6-8 AND 6-35 THROUGH 6-38**

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.

COMES NOW the City of Austin (City) doing business as Austin Water (Austin Water or AW) and files this Supplemental Response 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) Sixth Request for Information (RFI) to Austin Water, Questions 6-8 and 6-35 through 6-38.

Pursuant to 16 Tex. Admin. Code (TAC) § 22.144(c)(2)(F), Austin Water agrees and stipulates that all parties may treat the response as if the answer 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)



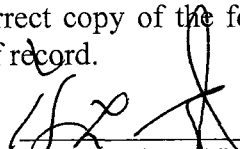
THOMAS L. BROCATO
tbrocato@lglawfirm.com
State Bar No. 03039030

W. PATRICK DINNIN
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 18, 2019, to the parties of record.



THOMAS L. BROCATO

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

AUSTIN WATER'S SUPPLEMENTAL RESPONSE TO DISTRICTS'
SIXTH RFL, QUESTIONS 6-8 AND 6-35 THROUGH 6-38

DISTRICTS 6-8: Regarding AW's rate case expenses in the current docket: Please separately quantify the rate case expenses related to AW's request to include each of the following expenses in the test year revenue requirements that were previously denied by the Commission (reference Schedule II-E-4.6):

- a. Reclaimed System Operating and Capital Costs
- b. SWAP and Commercial Paper Administration Costs
- c. Drainage Fees
- d. Revenue Stability Reserve Fund Surcharge
- e. Training and Non-Plant Expenses at Govalle Site
- f. Handcox (WTP4) Operating and Capital Costs

RESPONSE: Austin Water does not have the ability to retroactively break its rate case expenses down to the specificity requested by Districts.

Prepared by: W. Patrick Dinnin
Sponsored by: David Anders

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

**AUSTIN WATER'S SUPPLEMENTAL RESPONSE TO DISTRICTS'
SIXTH RFI, QUESTIONS 6-8 AND 6-35 THROUGH 6-38**

DISTRICTS 6-35: Please provide the base salary/wage separately for each AW employee allocated to the water function, and the basis and amount of the allocation factor used to allocate each employee's costs to the water function, by month, for the period beginning January 2017 through the most recent month for which this information is available. Please include job titles for each employee.

RESPONSE: Austin Water provided the information in the manner required by SOAH Order No. 7 in its response to Districts' RFI No. 6-35.¹ Please see AW Districts 6-35, Attachment 1.

Prepared by: W. Patrick Dinnin
Sponsored by: David Anders

¹ SOAH Order No. 7 at 8 (Oct. 14, 2019).

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

AUSTIN WATER'S SUPPLEMENTAL RESPONSE TO DISTRICTS'
SIXTH RFI, QUESTIONS 6-8 AND 6-35 THROUGH 6-38

DISTRICTS 6-36: Please provide the base salary/wage separately for each AW employee allocated to the wastewater function, and the basis and amount of the allocation factor used to allocate each employee's costs to the wastewater function, by month, for the period beginning January 2017 through the most recent month for which this information is available. Please include job titles for each employee.

RESPONSE: Austin Water provided the information in the manner required by SOAH Order No. 7 in its response to Districts' RFI No. 6-36.² Please see AW Districts 6-35, Attachment 1.

Prepared by: W. Patrick Dinnin
Sponsored by: David Anders

² SOAH Order No. 7 at 8.

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

AUSTIN WATER'S SUPPLEMENTAL RESPONSE TO DISTRICTS'
SIXTH RFI, QUESTIONS 6-8 AND 6-35 THROUGH 6-38

DISTRICTS 6-37: Please provide the base salary/wage separately for each AW employee allocated to the reclaimed water function, and the basis and the amount of the allocation factor used to allocate each employee's costs to the reclaimed water function, by month, for the period beginning January 2017 through the most recent month for which this information is available. Please include job titles for each employee.

RESPONSE: Austin Water provided the information in the manner required by SOAH Order No. 7 in its response to Districts' RFI No. 6-37.³ Please see AW Districts 6-35, Attachment 1.

Prepared by: W. Patrick Dinnin
Sponsored by: David Anders

³ SOAH Order No. 7 at 8.

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

AUSTIN WATER'S SUPPLEMENTAL RESPONSE TO DISTRICTS'
SIXTH RFI, QUESTIONS 6-8 AND 6-35 THROUGH 6-38

DISTRICTS 6-38: Please describe in detail any wage/salary increase that any AW employee received during the historical test year. Please identify the wage/salary increase percentage(s) given to each AW employee and the month in which the wage/salary increase for each AW employee became effective.

RESPONSE: Austin Water provided the information in the manner required by SOAH Order No. 7 in its response to Districts' RFI No. 6-38.⁴ Please see AW Districts 6-35, Attachment 1.

Prepared by: W. Patrick Dinnin
Sponsored by: David Anders

⁴ SOAH Order No. 7 at 8.