



Control Number: 49189



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

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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  
RESPONSE TO DISTRICTS'  
SECOND 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 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) Second Request for Information (RFI) to Austin Water. Districts served their Second RFI to Austin Water by email on August 9, 2019 at 4:45 p.m., therefore, Austin Water received Districts' request on August 12, 2019. This response is timely filed. Pursuant to 16 Tex. Admin. Code § 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)

  
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THOMAS L. BROCATO  
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State Bar No. 03039030

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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 September 3, 2019, to the parties of record.

  
\_\_\_\_\_  
THOMAS L. BROCATO

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

**DISTRICTS 2-1:** To the extent not provided in work papers already filed with the Application, please provide copies of the source documents, data, and work papers associated with the development of the Application. Please provide the underlying data and exhibits in both paper and electronic (Microsoft Excel Worksheet) forms. For the Microsoft Excel documents, please provide the worksheets with links intact and include all formulas embedded in the worksheets.

**RESPONSE:** Please see the responsive information, provided in AW 2-1, Attachments 1 through 129.

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

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

**DISTRICTS 2-2:** To the extent not provided in work papers already filed and related to the Direct Testimony of David A. Anders, Joseph H. Gonzales, Richard D. Giardina, Dan Wilkerson, Dennis P. Waley, Stephen J. Coonan, and Tab R. Urbantke, please provide copies of any articles, publications, regulatory decisions (outside of Texas), reference material, and documents cited in testimony or footnotes. If the referenced source is a book, please provide a copy of the relevant section of the book.

**RESPONSE:** Please see Austin Water's Response to Districts' RFI 1-3.

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

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

**DISTRICTS 2-3:** Please provide all spreadsheets in the Application in electronic format with all links intact, including any linked spreadsheets.

**RESPONSE:** Please see the Application of the City of Austin DBA Austin Water for Authority to Change Water and Wastewater Rates (Application) and the supporting direct testimonies, filed by Austin Water on April 15, 2019.

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

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

**DISTRICTS 2-4:** Please provide a crosswalk to link line items in Excel spreadsheets in the rate filing package to the cost of service models.

**RESPONSE:** Please see the responsive information, provided in AW 2-4, Attachments 1 through 3.

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

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

**DISTRICTS 2-5:** Please provide bond documents for all debt included in the rate filing package that support the debt service coverage requested in the Application.

RESPONSE: Please see the responsive information, provided in AW 2-1, Attachments 1-19. Additionally, please see the responsive information, provided in AW 2-5, Attachments 1-28.

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



# VOLUMINOUS ATTACHMENTS PROVIDED ON CD



AW 2-1, Attachment 1.pdf	AW 2-1, Attachment 41.pdf	AW 2-1, Attachment 81.pdf	AW 2-1, Attachment 121-River Place MUD_180129.xls
AW 2-1, Attachment 2.pdf	AW 2-1, Attachment 42.pdf	AW 2-1, Attachment 82.pdf	AW 2-1, Attachment 122-Schedule II-D-1_unitupdate_support.xlsx
AW 2-1, Attachment 3.pdf	AW 2-1, Attachment 43.pdf	AW 2-1, Attachment 83.pdf	AW 2-1, Attachment 123-Schedule II-D-4 working file.xlsx
AW 2-1, Attachment 4.pdf	AW 2-1, Attachment 44.pdf	AW 2-1, Attachment 84.pdf	AW 2-1, Attachment 124-Schedule II-D-7 working file.xlsx
AW 2-1, Attachment 5.pdf	AW 2-1, Attachment 45.pdf	AW 2-1, Attachment 85.pdf	AW 2-1, Attachment 125-Schedule II-D-9_support_rawdata.xlsx
AW 2-1, Attachment 6.pdf	AW 2-1, Attachment 46.pdf	AW 2-1, Attachment 86.pdf	AW 2-1, Attachment 126-Split for Other Payroll Information_Number of Employees.xlsx
AW 2-1, Attachment 7.pdf	AW 2-1, Attachment 47.pdf	AW 2-1, Attachment 87-08_WWVariableRateBonds.xls	AW 2-1, Attachment 127-Split for Other Payroll Information_Number of Employees.xlsx
AW 2-1, Attachment 8.pdf	AW 2-1, Attachment 48.pdf	AW 2-1, Attachment 88-08_WW_FixedSwapRate_sifma.xls	AW 2-1, Attachment 128.pdf
AW 2-1, Attachment 9.pdf	AW 2-1, Attachment 49.pdf	AW 2-1, Attachment 89-18_WW DFS_05-22-18.xls	AW 2-1, Attachment 129-Split for Other Payroll Information_Number of Employees.xlsx
AW 2-1, Attachment 10.pdf	AW 2-1, Attachment 50.pdf	AW 2-1, Attachment 90-08_WWW Swap_Analysis.xls	AW 2-4, Attachment 1-COS Model GL Account Crosswalk to II-D_8.16.19_Final.xlsx
AW 2-1, Attachment 11.pdf	AW 2-1, Attachment 51.pdf	AW 2-1, Attachment 91-2018-19 WWRP thru 0918 COS Submittal.xlsx	AW 2-4, Attachment 2-COS Wastewater Crosswalk 8.16.19 FINAL.xlsx
AW 2-1, Attachment 12.pdf	AW 2-1, Attachment 52.pdf	AW 2-1, Attachment 92-2019 Debt Recon to COS.xlsx	AW 2-4, Attachment 3-COS Water Crosswalk 8.16.19 FINAL.xlsx
AW 2-1, Attachment 13.pdf	AW 2-1, Attachment 53.pdf	AW 2-1, Attachment 93-AW Prepaid Data Download 2018.xlsx	AW 2-5, Attachment 1-08_WW_FixedSwapRate_sifma.xls
AW 2-1, Attachment 14.pdf	AW 2-1, Attachment 54.pdf	AW 2-1, Attachment 94-Back up for Schedule II-D-7.xlsx	AW 2-5, Attachment 2-08_WWVariableRateBonds.xls
AW 2-1, Attachment 15.pdf	AW 2-1, Attachment 55.pdf	AW 2-1, Attachment 95-Back-up for OC 6160.xlsx	AW 2-5, Attachment 3-08_WWW Swap_Analysis.xls
AW 2-1, Attachment 16.pdf	AW 2-1, Attachment 56.pdf	AW 2-1, Attachment 96-CIP 2018 Actuals V1.xlsx	AW 2-5, Attachment 4-18_WW DFS_05-22-18.xls
AW 2-1, Attachment 17.pdf	AW 2-1, Attachment 57.pdf	AW 2-1, Attachment 97-Copy of BG0240-6A - Monthly Actuals by Fund - Jan2019.xls	AW 2-5, Attachment 5-CUSR_2016_AWU Defeasance.xls
AW 2-1, Attachment 18.pdf	AW 2-1, Attachment 58.pdf	AW 2-1, Attachment 98-Copy of Debt Model_FY 2019-2020_11_14_18.xlsm	AW 2-5, Attachment 6-ENVIRONMENTAL REMEDIATION BREAKOUT FY16 and beyond.xls
AW 2-1, Attachment 19.pdf	AW 2-1, Attachment 59.pdf	AW 2-1, Attachment 99-Copy of FS0918 Bond Counsel-From Controller.xlsm	AW 2-5, Attachment 7-NWAustin MUD_Final_111710.xls
AW 2-1, Attachment 20.pdf	AW 2-1, Attachment 60.pdf	AW 2-1, Attachment 100-Copy of FY16-FY19 AW TK Charges_PUC Request_BR.xlsx	AW 2-5, Attachment 8-P161004.xls
AW 2-1, Attachment 21.pdf	AW 2-1, Attachment 61.pdf	AW 2-1, Attachment 101-Copy of FY19 AW TK PUC update_through 5_31_2019.xlsb.xlsx	AW 2-5, Attachment 9-River Place MUD_180129.xls
AW 2-1, Attachment 22.pdf	AW 2-1, Attachment 62.pdf	AW 2-1, Attachment 102-Copy of FY2018 Close II to FY2019 Approved by Object Code.xlsx	AW 2-5, Attachment 10.pdf
AW 2-1, Attachment 23.pdf	AW 2-1, Attachment 63.pdf	AW 2-1, Attachment 103-Copy of WWW TB-From Controller - Copy.xls	AW 2-5, Attachment 11.pdf
AW 2-1, Attachment 24.pdf	AW 2-1, Attachment 64.pdf	AW 2-1, Attachment 104-CUSR_2016_AWU Defeasance.xls	AW 2-5, Attachment 12.pdf
AW 2-1, Attachment 25.pdf	AW 2-1, Attachment 65.pdf	AW 2-1, Attachment 105-ENVIRONMENTAL REMEDIATION BREAKOUT FY16 and beyond.xls	AW 2-5, Attachment 13.pdf
AW 2-1, Attachment 26.pdf	AW 2-1, Attachment 66.pdf	AW 2-1, Attachment 107-FS0917_Final.xlsm	AW 2-5, Attachment 14.pdf
AW 2-1, Attachment 27.pdf	AW 2-1, Attachment 67.pdf	AW 2-1, Attachment 108-FS0918 Statements as of 1.31.19 from Controllers.xlsm	AW 2-5, Attachment 15.pdf
AW 2-1, Attachment 28.pdf	AW 2-1, Attachment 68.pdf	AW 2-1, Attachment 109-FY 2018-19 WRF thru 0918_Adjusted.xls	AW 2-5, Attachment 16.pdf
AW 2-1, Attachment 29.pdf	AW 2-1, Attachment 69.pdf	AW 2-1, Attachment 110-FY18 dump with vendor name advertising.xlsx	AW 2-5, Attachment 17.pdf
AW 2-1, Attachment 30.PDF	AW 2-1, Attachment 70.pdf	AW 2-1, Attachment 111-FY18 dump with vendor name donations.xlsx	AW 2-5, Attachment 18.pdf
AW 2-1, Attachment 31.pdf	AW 2-1, Attachment 71.pdf	AW 2-1, Attachment 112-FY18 dump with vendor name memberships.xlsx	AW 2-5, Attachment 19.pdf
AW 2-1, Attachment 32.pdf	AW 2-1, Attachment 72.pdf	AW 2-1, Attachment 113-FY19 AW Charges_PUC Request_45dayupdate_053119_support.xlsx	AW 2-5, Attachment 20.pdf
AW 2-1, Attachment 33.pdf	AW 2-1, Attachment 73.pdf	AW 2-1, Attachment 114-FY19-23 CIP Budget_Director Approved.xlsx	AW 2-5, Attachment 21.pdf
AW 2-1, Attachment 34.pdf	AW 2-1, Attachment 74.pdf	AW 2-1, Attachment 115-FY2018-19 Misc Revenue thru 0918.xls	AW 2-5, Attachment 22.pdf
AW 2-1, Attachment 35.pdf	AW 2-1, Attachment 75.pdf	AW 2-1, Attachment 116-II_D_9_1c_payrollcalculation.xlsx	AW 2-5, Attachment 23.pdf
AW 2-1, Attachment 36.pdf	AW 2-1, Attachment 76.pdf	AW 2-1, Attachment 117-II-D-10 Schedule Working File.xlsx	AW 2-5, Attachment 24.PDF
AW 2-1, Attachment 37.pdf	AW 2-1, Attachment 77.pdf	AW 2-1, Attachment 118-NWAustin MUD_Final_111710.xls	AW 2-5, Attachment 25.pdf
AW 2-1, Attachment 38.pdf	AW 2-1, Attachment 78.pdf	AW 2-1, Attachment 119-O&M_sourcedata.xlsx	AW 2-5, Attachment 26.pdf
AW 2-1, Attachment 39.pdf	AW 2-1, Attachment 79.pdf	AW 2-1, Attachment 120-P161004.xls	AW 2-5, Attachment 27.pdf
AW 2-1, Attachment 40.pdf	AW 2-1, Attachment 80.pdf		AW 2-5, Attachment 28.pdf