



Control Number: 49189



Item Number: 53

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OF

COME NOW, 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 (collectively, the “Districts”) and serve this, their Sixth Request for Information to the City of Austin dba Austin Water pursuant to 16 Tex. Admin. Code § 22.144, and request the following information and answers to the following questions be provided under oath. *See* 16 Tex. Admin. Code § 22.144 (2019).

Respectfully submitted,



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COUNSEL FOR DISTRICTS

CERTIFICATE OF SERVICE

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested to all parties on this the 11th day of September, 2019.



John J. Carlton

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

**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 SIXTH
REQUEST FOR INFORMATION TO CITY OF AUSTIN DBA AUSTIN WATER**

**I.
DEFINITIONS**

The following definitions apply herein unless otherwise indicated by the content or expressly stated:

1. The words “and” and “or” shall be construed either conjunctively or disjunctively, as required by the context, to bring within the scope of these discovery requests any response or document that might be deemed outside its scope by another construction.
2. “AW” or “Austin Water” means the City of Austin DBA Austin Water.
3. “Communication” shall mean and include every manner or means of transmittal, disclosure, transfer, or exchange of information, and every form of transmission, disclosure, transfer or exchange of information, whether orally, electronically, or by document, and whether face-to-face, by telephone, mail, personal delivery, computer or otherwise.
4. “Concerning,” “relating to,” or “regarding,” and similar terms mean addressing, analyzing, referring, discussing, mentioning in any way, explaining, supporting, describing, forming the basis for, or being logically or casually connected in any way with the subject of these discovery requests.
5. “Describe” or “describe in detail” means to give a complete and full description concerning the matter about which the inquiry is made, including the full name, address, and telephone number(s) of the person(s) involved, dates, times, places, and other particulars, including all relevant documents and observations which make the answers to these written discovery requests fair and meaningful.
6. “Document” means any documents or tangible items made discoverable by Texas Rule of Civil Procedure 192.3, and includes all originals and non-identical copies of any and all documents, papers, books, accounts, writings, drawings, graphs, charts, maps, surveys, photographs, electronic or videotape recordings, electronic mail (e-mail), phone records, recordings, other data compilations from which information can be obtained and translated by you, if necessary, into reasonably useable form and tangible things. *See* Tex. R. Civ. P. 192.3 (2019).
7. To “identify” an individual means to state the following about that individual: (i) the person’s full name; (ii) the person’s job title or former job title; (iii) the person’s job (or

former job) duties and responsibilities; (iv) the individual's superior(s); (v) current or last known telephone number(s); and (vi) current or last known business and home addresses.

8. To "identify" a person as defined herein other than an individual means to provide the following information: (i) the entity's full and correct legal name; (ii) the nature of the entity's structure and/or organization; (iii) the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and (iv) its principal line(s) of business or activity.
9. To "identify" an act, event, occurrence, or communication means the following: (i) to state its date; (ii) to identify the persons that were parties to and/or witnesses of the act, event, occurrence, or communication; (iii) to describe where and how it took place; and (iv) to identify any document that constitutes or refers to such act, event, occurrence, or communication.
10. To "identify" a document means the following: (i) to identify all files in which it and all copies of it are found; (ii) to identify its author; (iii) to identify its addressees, if any; (iv) to identify those persons who received a copy thereof; (v) to identify its current custodian or the person that had last known possession, custody, or control thereof; (vi) to state the date of its preparation; and (vii) to state its general subject matter giving a reasonably detailed description thereof.
11. "Docket 42857" refers to *Petition of the North Austin Municipal Utility District No. 1, Northtown Municipal Utility District, Travis County Water Control and Improvement District No. 10, and Wells Branch Municipal District from the Ratemaking Actions of the City of Austin and Request for Interim Rates in Williamson and Travis Counties*, Docket 42857 (Sept. 5, 2014).
12. "Person" or "Persons" means any natural person, corporation, association, firm, partnership, or other business or legal entity and officers, employees, agents, attorneys, servants or representatives of such entity, as the context requires.
13. "Petitioners" refers to, collectively, 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.
14. "Districts" means and 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.
15. "PUC" or "Commission" refers to the Public Utility Commission of Texas and all predecessor agencies with similar responsibilities, including the Texas Commission on Environmental Quality, Texas Natural Resource Conservation Commission, Texas Water Commission, and Texas Department of Health.
16. "Relate" or "relating to" means making or including a statement about, discussing, describing, reflecting, consisting of, constituting, comprising or in any way concerning in whole or in part the subject or thing.

17. “Service” has the same meaning as defined by Texas Water Code § 13.002(21) (2019).
18. “Statement” means and includes any written or graphic statement signed or otherwise adopted or approved by the user in making it, and stenographic, mechanical, electrical or other recording or transcription thereof, which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.
19. “You” or “your” means and refers to the City of Austin, and any person or entity acting or purporting to act on its behalf, including, without limitation, attorneys, agents, advisors, consultants, investigators, representatives, employees, or other persons.
20. “Employee” means any full-time employee, part-time employee, contract employee working on a temporary or long-term basis, or consultant working for any period of time for the entity.

II.

INSTRUCTIONS

1. These discovery requests must be answered in strict compliance with the orders of the Administrative Law Judge hearing this Docket, the Texas Rules of Civil Procedure, and the rules of the PUC.
2. Your answers to the interrogatories must be answered separately and fully in writing, and the answers must be signed and verified under oath by the person making the answers.
3. In those instances when the responding party chooses to answer an interrogatory by referring to a specific document or record, the specification must be in sufficient detail to permit the requesting party to locate and identify the records and/or documents from which the answer is to be ascertained as readily as the party served with the request.
4. Whenever you are asked in these discovery requests to describe, identify, or produce documents, the term “documents” is not limited to documents in your actual or constructive possession, custody or control (as defined by Texas Rule of Civil Procedure 192.7(b)), but also includes all documents that you know to exist or which have existed, or which you have reason to suspect to be in existence or to have been in existence, irrespective of whether the document is one intended for or transmitted internally by you or intended for or transmitted to any other person or entity, including without limitation any governmental agency, department, administrative entity, or their personnel. *See* Tex. R. Civ. P. 192.7(b).
5. Whenever you are asked in these discovery requests to describe or identify documents that once existed but which no longer exist, in addition to identifying the documents, please indicate the approximate date and the circumstances under which the documents ceased to exist. Whenever you are asked in these discovery requests to describe or identify documents that are not in your actual or constructive possession, custody, or control, as those terms are defined in Texas Rule of Civil Procedure 192.7(b), please identify (by name, address, and telephone number) the person whom you believe to have such possession, custody, or control. *See id.*

6. If a discovery request calls upon you to state your legal or factual contentions and/or the legal or factual basis for your contentions in this lawsuit, you should respond in accordance with Texas Rule of Civil Procedure 192.3(j). Such requests do not seek to require you to marshal all of your evidence. *See* Tex. R. Civ. P. 192.3(j).
7. As used in these discovery requests, the singular and masculine form of a noun or pronoun includes the plural, feminine, or the neuter form, where appropriate.
8. As used in these discovery requests, the past tense includes the present tense where the express meaning of the request is not distorted by that usage, and the verb form of a noun or pronoun may be used as appropriate in a particular context.

III. **DUTY TO SUPPLEMENT**

You are under a continuing duty to supplement your responses within five days after you obtain information on the basis of which you know that a response either (1) was incorrect or incomplete when submitted or, (2) although correct and complete when submitted, is no longer correct and complete, and the circumstances are such that failure to supplement the response is, in substance, misleading. *See* 16 Tex. Admin. Code § 22.144(i); Tex. R. Civ. P. 193.5(a).

IV. **REQUESTS FOR INFORMATION**

DISTRICTS' REQUEST TO CITY 6-1. Please see Exhibit A, which is a compilation of rate case expenses related to prudence from Lloyd Gosselink, which total approximately fifty attorney hours and \$15,000 in legal fees. *See* Exhibit A. Is AW requesting recovery of some or all of its prudence-related rate case expenses?

DISTRICTS' REQUEST TO CITY 6-2. Is AW asking for a prudence finding in this docket for WTP4 plant investment?

DISTRICTS' REQUEST TO CITY 6-3. Is AW requesting a prudence finding in this docket for debt service assigned to WTP4 plant investment?

DISTRICTS' REQUEST TO CITY 6-4. Please identify all documents provided in *Application of AW for Authority to Change Water and Wastewater Rates*, (April 15, 2019), that would permit a prudence evaluation to be conducted on WTP4 debt service and capital costs.

DISTRICTS' REQUEST TO CITY 6-5. Please provide AW's original economic analysis supporting the construction of WTP4, along with any updated analyses that were performed to assess the impact of changing conditions on the original decision to construct the facility. If no such analyses were performed, please so state.

DISTRICTS' REQUEST TO CITY 6-6. Please describe in detail and identify and produce all documents concerning all alternatives to constructing WTP4 that were considered, including the costs of those alternatives.

DISTRICTS' REQUEST TO CITY 6-7. Provide the results of any sensitivity analyses that evaluated the construction of WTP4 versus other alternatives.

DISTRICTS' REQUEST TO CITY 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

DISTRICTS' REQUEST TO CITY 6-9. Does AW propose to exclude rate case expenses associated with GFT since recovery of GFT is not being requested?

DISTRICTS' REQUEST TO CITY 6-10. Please refer to the water asset listing used in Docket No. 42857 (AW Resp to Pet. 2-113).

- a. Please identify each water asset that has been removed from this listing compared to the water asset listing used in *Application of AW to Change Water and Wastewater Rates*. See *Application of AW to Change Water and Wastewater Rates, WP II-A-3.2 (W) Other Physical Property* (April 15, 2019);
- b. For each water asset identified in Part (a) of this request, please indicate whether the water asset was transferred out of AW, sold, or retired.

DISTRICTS' REQUEST TO CITY 6-11. For each water asset reported in Request 6-10(b) as being listed in Docket No. 42857 but subsequently transferred out of AW, please provide the following information at the time the asset was transferred:

- a. FA No.
- b. Transfer date
- c. Acq Dt
- d. Description
- e. Acq value
- f. Accum Depreciation
- g. Useful Life
- h. Acq Year
- i. Annual Depr
- j. Code Desc
- k. Book Value

- l. Amount of associated debt service transferred out of AW in conjunction with the transfer of the asset
- m. Journal entry used to record the transfer

DISTRICTS' REQUEST TO CITY 6-12. For each water asset reported in Request 6-10(b) as being listed in Docket No. 42857 but subsequently sold, please provide the following information at the time the asset was transferred:

- a. FA No.
- b. Transfer date
- c. Acq Dt
- d. Description
- e. Acq value
- f. Accum Depreciation
- g. Useful Life
- h. Acq Year
- i. Annual Depr
- j. Code Desc
- k. Book Value
- l. Amount of associated debt service transferred out of AW in conjunction with the transfer of the asset
- m. Journal entry used to record the transfer

DISTRICTS' REQUEST TO CITY 6-13. Please refer to the wastewater asset listing used in Docket No. 42857 (AW Resp. to Pet. 3-94).

- a. Please identify each wastewater asset that has been removed from this listing compared to the wastewater asset listing used in *Application of AW to Change Water and Wastewater Rates. See Application of AW to Change Water and Wastewater Rates, WP II-A-3.2 (WW) Other Physical Property* (April 15, 2019);
- b. For each wastewater asset identified in Part (a) of this request, please indicate whether the wastewater asset was transferred out of AW, sold, or retired.

DISTRICTS' REQUEST TO CITY 6-14. For each wastewater asset reported in Request 6-13(b) as being listed in Docket No. 42857 but subsequently transferred out of AW, please provide the following information at the time the asset was transferred:

- a. FA No.
- b. Transfer date
- c. Acq Dt
- d. Description
- e. Acq value
- f. Accum Depreciation
- g. Useful Life
- h. Acq Year
- i. Annual Depr
- j. Code Desc

- k. Book Value
- l. Amount of associated debt service transferred out of AW in conjunction with the transfer of the asset
- m. Journal entry used to record the transfer

DISTRICTS' REQUEST TO CITY 6-15. For each wastewater asset reported in Request 6-13(b) as being listed in Docket No. 42857 but subsequently sold, please provide the following information at the time the asset was transferred:

- a. FA No.
- b. Transfer date
- c. Acq Dt
- d. Description
- e. Acq value
- f. Accum Depreciation
- g. Useful Life
- h. Acq Year
- i. Annual Depr
- j. Code Desc
- k. Book Value
- l. Amount of associated debt service transferred out of AW in conjunction with the transfer of the asset
- m. Journal entry used to record the transfer

DISTRICTS' REQUEST TO CITY 6-16. What is the basis for allocating contributed capital to customer classes?

DISTRICTS' REQUEST TO CITY 6-17. Why was contributed capital excluded from the summary of the water fixed assets (Table 215) in Docket No. 42857 but included in the summary of the water fixed assets (Table 72-2) in the current Application.

DISTRICTS' REQUEST TO CITY 6-18. Please describe in detail the process that the City of Austin follows in order to adopt or amend AW's financial policies. Describe in detail which department initiates the policies or amendments.

DISTRICTS' REQUEST TO CITY 6-19. Please describe in detail how debt service coverage is calculated for budget purposes, for financial statement purposes, and for rate setting purposes.

DISTRICTS' REQUEST TO CITY 6-20. Please identify and produce all internal audit reports related to AW's operations since 2015. If any internal audits of other city departments contain findings regarding amounts allocated to AW for services provided, please identify and produce such reports.

DISTRICTS' REQUEST TO CITY 6-21. Please provide all studies conducted since 2015 that compare the costs of AW's transfers and payments to other city departments to the costs of the same services and functions performed by unrelated third parties.

DISTRICTS' REQUEST TO CITY 6-22. Identify any assets on the water fixed asset listing that were not in service on 9/30/18.

DISTRICTS' REQUEST TO CITY 6-23. Identify any assets on the water fixed asset listing that are not currently in service.

DISTRICTS' REQUEST TO CITY 6-24. Identify any assets on the wastewater fixed asset listing that were not in service on 9/30/18.

DISTRICTS' REQUEST TO CITY 6-25. Identify any assets on the wastewater fixed asset listing that are not currently in service.

DISTRICTS' REQUEST TO CITY 6-26. Please produce the FY 2018 water system budget in Excel with the same detail and with the same headings as AW's document production Bates # RPD Resp-4423 to # RPD Resp-4520, in Docket No. 42857.

DISTRICTS' REQUEST TO CITY 6-27. Please produce the FY 2018 wastewater system budget in Excel with the same detail and with the same headings as AW's document production Bates # RPD Resp-4423 to # RPD Resp-4520, in Docket No. 42857.

DISTRICTS' REQUEST TO CITY 6-28. Please produce the FY 2018 reclaimed water system budget in Excel with the same detail and with the same headings as AW's document production Bates # RPD Resp-4423 to # RPD Resp-4520, in Docket No. 42857.

DISTRICTS' REQUEST TO CITY 6-29. Please produce the FY 2019 water system budget in Excel with the same detail and with the same headings as Austin's document production Bates # RPD Resp-4423 to # RPD Resp-4520, in Docket No. 42857.

DISTRICTS' REQUEST TO CITY 6-30. Please produce the FY 2019 wastewater system budget in Excel with the same detail and with the same headings as AW's document production Bates # RPD Resp-4423 to # RPD Resp-4520, in Docket No. 42857.

DISTRICTS' REQUEST TO CITY 6-31. Please produce the FY 2019 reclaimed water system budget in Excel with the same detail and with the same headings as AW's document production Bates # RPD Resp-4423 to # RPD Resp-4520, in Docket No. 42857.

DISTRICTS' REQUEST TO CITY 6-32. Please describe in detail and identify and produce all documents concerning all changes that have been implemented in accounting policy since Docket No. 42857, that have resulted in AW currently expensing costs that were capitalized at the time of

Docket 42857, or that have resulted in AW currently capitalizing costs that were expensed at the time of Docket 42857.

- a. Please identify and produce all internal documents concerning the accounting changes, including communications regarding the changes in accounting policy, and documents that provide the explanation for the accounting policy changes.
- b. For each accounting change, describe in detail and identify and produce documents demonstrating the total number of dollars allocated to water that were affected by each specific accounting change during each specific year, and the total number of dollars allocated to wastewater that were affected by each specific accounting change during each specific year.

DISTRICTS' REQUEST TO CITY 6-33. Please identify W. Patrick Dinnin, the preparer of several responses to AW's Responses to Districts' First Request.

DISTRICTS' REQUEST TO CITY 6-34. Should Mr. Brocato's time and legal fees associated with editing draft testimony in *Joint Report and Application of Oncor Electric Delivery Co., LLC, Sharyland Dist. & Transmission Services L.L.C., Sharyland Utilities L.P., and Sempra Energy for Reg. Approvals under PURA §§ 14.101, 37.154, 39.262, and 39.915*, Docket No. 48929, on March 4, 2019, be removed from the AW invoice?

DISTRICTS' REQUEST TO CITY 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.

DISTRICTS' REQUEST TO CITY 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.

DISTRICTS' REQUEST TO CITY 6-37. Please provide the base salary/wage separately for each AW employee allocated to the reclaimed water function, and the basis and 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.

DISTRICTS' REQUEST TO CITY 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.

DISTRICTS' REQUEST TO CITY 6-39. Please describe in detail and identify and produce all documents concerning the average annual base wage/salary increases that have been given to water employees of AW for each of the last five fiscal years.

DISTRICTS' REQUEST TO CITY 6-40. Please describe in detail and identify and produce all documents concerning the average annual base wage/salary increases that have been given to wastewater employees of AW for each of the last five fiscal years.

DISTRICTS' REQUEST TO CITY 6-41. Please describe in detail and identify and produce all documents concerning the average annual base wage/salary increases that have been given to reclaimed water employees of AW for each of the last five fiscal years.

DISTRICTS' REQUEST TO CITY 6-42. Please confirm that the payroll included in *Application of AW to Change Water and Wastewater Rates* (April 15, 2019) does not include costs for any position that was vacant at the end of the FY 2018 test year. If this cannot be confirmed, please provide a detailed schedule of each of the vacancies included and the associated payroll costs.

DISTRICTS' REQUEST TO CITY 6-43. For each of the last five fiscal years, including the historical test year, please describe in detail and identify and produce documents concerning any incentive compensation plan that was in effect during that year and that was available to the employees of AW. Please provide the total number of AW employees eligible for each incentive compensation plan, including a list of performance metrics that would render an AW employee eligible for an award under each incentive compensation plan, and the method of evaluation that was used to determine if an AW employee would receive an award under each incentive compensation plan.

DISTRICTS' REQUEST TO CITY 6-44. Please describe any changes that have been made to any short-term or long-term incentive compensation plan that has been available to any employee of AW since the time when the incentive compensation plan was effective in Docket No. 42857.

DISTRICTS' REQUEST TO CITY 6-45. Please provide copies of all compensation studies that were reviewed in setting base salaries, short-term incentive compensation, and long-term incentive compensation for each AW employee position during the test year and from the test year through June 2019.

DISTRICTS' REQUEST TO CITY 6-46. Please provide the Austin City Council meeting notes, presentations, or other documents related to the approval of any AW compensation adjustments during the test year through June 2019.

DISTRICTS' REQUEST TO CITY 6-47. Austin Water witness David Anders testified as follows:

The rates in this case are stated in the direct testimony of Joseph Gonzalez beginning at page 50. For a comparison of currently approved operating expenses and operating income as previously authorized and as proposed in this application, please see Schedules II-A-2-1, II-A-2-2, II-A-2-2(w) and II-A-2-2(ww).

Application of AW to Change Water and Wastewater Rates, Direct Testimony of David Anders, at 8, lines 13-16 (April 15, 2019). Please describe in detail and identify and produce documents that demonstrate Mr. Anders's meaning of the words "currently approved operating expenses," as used in the context of his testimony. *Id.*

DISTRICTS' REQUEST TO CITY 6-48. David Anders further testified that "... Shady Hollow MUD challenged AW's rates, but that case was resolved through settlement, with the Commission's approval." *Id.*, at 10, lines 15-17. Please describe in detail and identify and produce all documents that concern the Commission's approval of the settlement of Shady Hollow MUD's challenge of AW's rates. *See id.*

DISTRICTS' REQUEST TO CITY 6-49. David Anders also testified that the "reclaimed water system is a cost-effective water source which extends AW's current water supply portfolio." *Id.*, at 27, lines 7-8. Please describe in detail and identify and produce all documents that support Mr. Anders's testimony that the reclaimed water system is "cost-effective." *Id.*

DISTRICTS' REQUEST TO CITY 6-50. Austin Water witness Dan Wilkerson testified that "[a]ll ratepayers, both retail and wholesale, have benefitted from AW's financial policy. In the long run, it is best for Petitioners if AW remains financially healthy and all customers contribute equally to DSC." *Application of AW to Change Water and Wastewater Rates, Direct Testimony of Dan Wilkerson*, at 19, lines 14-17 (April 15, 2019). How does Mr. Wilkerson propose that all customers "contribute equally to DSC"? *Id.*

Attachment A

Excerpts from Lloyd Gosselink legal bills from II E-4.4 RCE invoices.pdf

Date	Atty	Description of Services Rendered	Hours
7/17/2018	TLB	Research Docket No. 42857 prudence issues regarding WTP4 (Rate Base).	0.70
7/26/2018	JLM	Office conference with T. Brocato regarding research assignment on prudence review; begin research (Rate Base).	2.70
8/6/2018	TLB	Finalize and distribute settlement proposal; research WTP4 prudence issues; review revenue requirement calculations (Settlement 1.4 / (Rate Base .5 / Revenue Requirement .5).	0.50
8/6/2018	JLM	Continue researching prudence issue (Rate Base).	1.40
8/7/2018	JLM	Continue researching prudence issue (Rate Base).	0.80
8/17/2018	JLM	Continue researching prudence issue (Rate Base).	5.50
8/19/2018	TLB	Prepare for settlement meeting; review prudence and Docket No. 42857 issues (Rate Base).	1.50
8/21/2018	JLM	Begin drafting memo on prudence issue (Rate Base).	1.60
8/22/2018	JLM	Continue drafting memo on prudence issue; prepare for and attend settlement discussion at Austin Water (Administrative).	6.30
8/26/2018	TLB	Review prudence memo (Rate Base).	0.60
8/30/2018	JLM	Continue drafting prudence memo (Rate Base).	4.50
8/31/2018	JLM	Continue drafting prudence memo (Rate Base).	2.40
9/3/2018	TLB	Review draft prudence memo (Rate Base).	0.80
9/4/2018	JLM	Continue revising memo on prudence review (Rate Base).	0.80
9/20/2018	JLM	Meeting with T. Brocato and C. Brewster regarding preparation for Austin Water rate filing; finalize memo on WTP4 (Administrative).	1.40
9/21/2018	JLM	Finalize WTP4 memo; begin reviewing testimony and materials from Austin Water.	2.60
10/8/2018	TLB	Research prudence issues; call with K. Gross regarding procedural issues; research precedent regarding rate filing contents; research testimony (Administration).	4.00
10/9/2018	TLB	Review plant information; research plant issues; prepare staff presentation (Administration).	1.90
10/10/2018	TLB	Research procedural issues; prepare for meeting regarding rate base issues; prepare for and meet with Austin Water staff regarding WTP4; prepare for meeting with PUC staff (Administration)	7.50
10/12/2018	TLB	Research notice, GFT, prudence, rate base, depreciation issues; prepare for client meeting (Administration).	5.10
TOTAL			52.60

SUMMARY OF PROFESSIONAL SERVICES RELATED TO PRUDENCE/WTP4

Hours	Rate	Name	Total
22.60	\$ 345.00	Thomas L. Brocato	\$ 7,797.00
30.00	\$ 250.00	James L. Mauldin	\$ 7,500.00
52.60		TOTALS	\$ 15,297.00