



Control Number: 49189



Item Number: 54

Addendum StartPage: 0

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

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

§
§
§
§

**BEFORE THE STATE OFFICE
OF**

ADMINISTRATIVE HEARINGS

2019 SEP 12 AM 10:34
FILED
PUC DOCKET NO. 49189

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-24**

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 attorneys 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 78711-3326.

Dated: September 12, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney



Eleanor D' Ambrosio
State Bar No. 24097559
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7021
(512) 936-7268 (facsimile)
Eleanor.Dambrosio@puc.texas.gov

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

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on September 12, 2019 in accordance with 16 Texas Administrative Code § 22.74.


Eleanor D' Ambrosio

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

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-24**

DEFINITIONS

- A. "COA," 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.

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

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-24**

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.

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

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-24**

- Staff 4-1 How does Austin Water define its transmission system? What constitutes transmission service?
- Staff 4-2 How does Austin Water define its distribution system? What constitutes distribution service?
- Staff 4-3 For the purpose of Staff's review of cost allocation issues in this proceeding, please identify all City of Austin plant accounts where the full plant amount is directly assigned to the transmission system. For each account, please provide a narrative explanation of the justification for directly assigning the full amount in that account to the transmission system.
- Staff 4-4 For the purpose of Staff's review of cost allocation issues in this proceeding, please identify all City of Austin plant accounts where the full plant amount is directly assigned to the distribution system. For each account, please provide a narrative explanation of the justification for directly assigning the full amount in that account to the distribution system.
- Staff 4-5 Please identify all City of Austin accounts where the amounts in the account are allocated among the transmission and distribution systems. For each account, please explain the methodology Austin Water follows to allocate the amounts among the transmission and distribution systems, and provide all the supporting workpapers. For each account, provide a narrative explanation of the justification for the allocation basis for that account.
- Staff 4-6 For the purpose of Commission Staff's review of water cost allocation issues in this proceeding, please map each of the codes listed in workpaper "2018 Fixed Assets Pivot Table" at worksheet "Wtr Codes" to an account within the NARUC's Uniform System of Accounts for Class A Water Utilities.
- Staff 4-7 For the purpose of Commission Staff's review of wastewater cost allocation issues in this proceeding, please map each of the codes listed in workpaper "2018 Fixed Assets Pivot Table" at worksheet "WW Codes" to an account within the NARUC's Uniform System of Accounts for Class A Wastewater Utilities.
- Staff 4-8 What was the cutoff date for the plant amounts shown in the workpaper "2018 Fixed Assets Pivot Table"?
- Staff 4-9 For each wholesale water customer (not limited to petitioners), provide the diameters of the transmission mains that serve that customer. For each

transmission main, indicate if that transmission main also serves Austin Water's retail customers.

- Staff 4-10 Please provide the diameters for all transmission mains on the water system.
- Staff 4-11 For each diameter of transmission main on the water system, please provide the total length of transmission mains of that diameter on the system and provide the system-average cost per unit of length.
- Staff 4-12 For each transmission main that serves a wholesale water customer (not limited to petitioners), please provide the total length of the transmission main. Also provide the length of segment of the total main that serves the wholesale customer.
- Staff 4-13 Are transmission mains on the water system inter-connected such that water can be diverted from one main to another if a segment of the main on the primary feed path to a wholesale water customer is not in service? Please explain. If yes, did this situation arise during the test year (i.e., wholesale transmission main was down and wholesale water customer was served through an alternate feed path). Please explain.
- Staff 4-14 For each wholesale water customer, please provide the diameters of the distribution mains that serve that customer (if any).
- Staff 4-15 Please explain all types of demand (e.g., gallons per second or minute) and usage (e.g., gallonage) information that is captured and recorded by the meters on Austin Water's transmission mains. For each type of demand and usage information at the meter, please identify where the test-year meter information may be found in the application (if anywhere).
- Staff 4-16 To the extent not already provided, please provide the peak demand for water (expressed as a throughput per unit of time, such as gallons per second) on the system during each month of the test year. If already provided, please provide a citation to where the information may be found.
- Staff 4-17 For each wholesale water customer (not limited to petitioners), please provide that customer's peak demand for water during each month of the test year.
- Staff 4-18 For each wholesale water customer (not limited to petitioners) and for each month of the test year, please provide that customer's monthly demand that was coincident with the system's peak demand in that month.
- Staff 4-19 Please explain how Austin Water sizes its transmission mains to ensure that adequate capacity is available to serve customers. Please provide all capacity planning manuals or guides that support Austin Water's capacity planning methodologies.
- Staff 4-20 Provide the test-year total capacity on the water system in gallons per day.
- Staff 4-21 Provide the test-year maximum daily usage on the water system in gallons and the date it occurred.

- Staff 4-22 Provide the test-year maximum hourly usage on the water system in gallons and the date and hour it occurred.
- Staff 4-23 For each wholesale water customer (not limited to petitioners) and for each month of the test year, provide (a) the maximum daily usage in gallons, (b) the maximum hourly usage in gallons, (c) usage in gallons during the day of maximum usage on the system as a whole, (d) usage in gallons during the hour of maximum usage on the day of maximum usage for the system, (e) average daily usage.
- Staff 4-24 For retail customers considered as a whole and for each month of the test year, provide (a) the maximum daily usage in gallons, (b) the maximum hourly usage in gallons, (c) usage in gallons during the day of maximum usage on the system as a whole, (d) usage in gallons during the hour of maximum usage on the day of maximum usage for the system, (e) average daily usage.