



Control Number: 49189



Item Number: 55

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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**

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§  
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§

**BEFORE THE STATE OFFICE**

**OF**

**ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION  
TO THE CITY OF AUSTIN DBA AUSTIN WATER  
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-19**

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.

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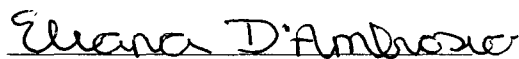
Dated: September 13, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Karen S. Hubbard  
Managing Attorney

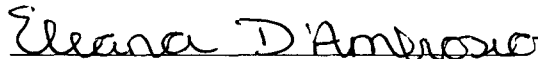


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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on September 13, 2019 in accordance with 16 Texas Administrative Code § 22.74.



Eleanor D'Ambrosio

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**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.

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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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- Staff 5-1      Please refer to the workpaper "AW Water COS Model Docket 49189." For each worksheet in this workpaper, provide the units of measurement for each line item in that worksheet.
- Staff 5-2      Please confirm or deny that Austin Water is proposing to set rates in this proceeding based on actual information from an historical test year. If not confirmed, please explain.
- Staff 5-3      Please comprehensively explain the "11-Month Implementation Adjustment Factor" shown in column V to worksheet "111. Rev Reconciliation" to the workpaper "AW Water COS Model Docket 49189." Why is this used as a component of the wholesale water revenue requirement? How does it constitute a cost of providing water service to wholesale customers? Explain.
- Staff 5-4      Please refer to worksheet "100. Net Volumetric Rev Req" to AW's water COS model. For each of the following columns, please explain the type of charge AW proposes to set to recover the amounts in that column from wholesale water petitioners:
- RSF rev req
  - Fixed rev req
  - Rev Recovery from Additional Fixed Fee
  - Net Volumetric Revenue Requirement
- Staff 5-5      Please refer to the workpaper "AW Water COS Model Docket 49189" at worksheet "29. O&M Budget." Are the amounts in column H actual historical costs (as suggested by the column heading), or budgeted costs (as suggested by the worksheet heading in Microsoft Excel cell C3 and the name of the worksheet)? Please explain.
- Staff 5-6      Did any of the petitioners receive reclaimed water from Austin Water during the Test Year? Please explain.
- Staff 5-7      Did any of AW's 16 wholesale water or 10 wholesale wastewater customers receive reclaimed water from Austin Water during the Test Year?
- Staff 5-8      Have any of AW's wholesale customers ever received any reclaimed water from Austin Water's reclamation system? Please explain.

- Staff 5-9 Please provide all studies, reports or analyses prepared by Austin Water or in its possession that quantify the economic value of the water reclamation system's capacity for facilitating the avoidance of surcharges from LCRA or other water suppliers that occur when water is scarce or volume triggers are exceeded; or, the economic value of the avoidance of service interruptions that AW believes might otherwise occur in the absence of the reclamation system under certain conditions.
- Staff 5-10 Has Austin Water ever had to implement involuntary curtailments of water services to its water customers on an unplanned basis as a result of water shortages? Please explain.
- Staff 5-11 Please provide all studies, reports or analyses prepared by Austin Water or in its possession that evaluate the likelihood that Austin Water will experience involuntary interruptions in its water supply from LCRA.
- Staff 5-12 Please provide the proposed wholesale tariffs under which Austin Water proposes to assess the proposed charges to petitioners, or provide citations to where they may be found in the application, if anywhere.
- Staff 5-13 Please explain what each of the following cost pools represents and why it is necessary to allocate costs separately to the cost pools: watershed land purchases, LCRA, reserve fund. For each cost pool, indicate if any of the costs included in that cost pool are allocated to petitioners and if yes explain why. How does Austin Water define "cost pool"?
- Staff 5-14 Is Austin Water proposing to charge petitioners to fund bill credits to AW's retail customers to address over-billings from leaks and other bill adjustments? If yes, please explain AW's rationale for assessing these charges to petitioners; and, provide citations to where the amounts proposed to be assigned to petitioners can be found in AW's cost study.
- Staff 5-15 Please refer to AW witness Gonzalez' testimony at table 4. Please explain what "flow" represents as shown in this table. Is it a measure of throughput per unit of time? If so, what are the units of time used to derive the "flow" information in this table?
- Staff 5-16 Do Austin Water's capacity costs on the water and wastewater systems vary more in proportion to flow rates on the system over short time horizons (e.g., gallons per second) or long time horizons (e.g., gallons per day, month, or year)? If more on short time horizons, has Austin Water included this information in its filing? If yes, where? Has Austin Water considered allocating costs based on short-time horizon flow rates? If not, why not?

- Staff 5-17 Please refer to AW witness Gonzalez' testimony at 48. Please provide a citation to where in Docket No. 42857 the Commission ordered AW to increase the Inflow & Infiltration flows for wholesale wastewater petitioners. Please also explain why AW believes the Commission is bound in this proceeding by what AW claims the Commission ordered in Docket No. 42857. Please explain the rationale for this flow adjustment; and, explain how it is consistent with cost causation.
- Staff 5-18 How does water usage on the system become "unaccounted for"? Please explain the circumstances that give rise to total metered usage on the system being less than total system usage. Do any unexplained or unaccounted for losses occur in the transmission system, or are the losses and unaccounted for usage limited to the distribution system or other functions? Please explain.
- Staff 5-19 Please explain the methodology Austin Water follows to determine equivalent fire connections for each class of service, and provide all the supporting workpapers.