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### SOAH DOCKET NO. 473-19-6297.WS PUC DOCKET NO: 49189 13 AHI: 50

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

**BEFORE THE STATE OFFICE** Ling rest

OF

ADMINISTRATIVE HEARINGS

## **CITY OF AUSTIN D/B/A AUSTIN WATER'S RESPONSE TO COMMISSION STAFF'S** SECOND REQUEST FOR INFORMATION

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To: Public Utility Commission of Texas (Commission), by and through its attorney of record, Alexander Petak, Legal Division, 1701 N. Congress Avenue, Austin, Texas 78701.

The City of Austin (City) doing business as Austin Water (Austin Water or AW) files its Responses to Public Utility Commission Staff's Second Request for Information (RFI) to Austin Water received on August 29, 2019. This response is timely filed. Pursuant to 16 Tex. Admin. Code (TAC) § 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) 328-5800 (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 September 18, 2019, to the parties of record.

THOMAS L. BROCATO

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

### AUSTIN WATER'S RESPONSE TO COMMISSION STAFF'S SECOND RFI

**Staff 2-1** Does the City of Austin's water and wastewater facilities have self-insurance? If yes, please provide the reserve amount.

**RESPONSE:** The City has all-risk property insurance through FM Global Insurance for all City-owned and leased real and personal property, including water and wastewater facilities. The City is not self-insured for property insurance and does not have a property insurance reserve account.

Prepared by:	Songli Floyd
Sponsored by:	David Anders

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# AUSTIN WATER'S RESPONSE TO COMMISSION STAFF'S SECOND RFI

Staff 2-2 If self-insured, please provide the amount of any shortage or surplus for the reserve account for the self-insurance.

**RESPONSE:** The City is not self-insured for property insurance and does not have a property insurance reserve account.

Prepared by:	Songli Floyd
Sponsored by:	David Anders