



Control Number: 49189



Item Number: 60

Addendum StartPage: 0

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

2019 SEP 19 PM 12:53

APPLICATION OF THE CITY OF § BEFORE THE STATE OFFICE
AUSTIN DBA AUSTIN WATER FOR §
AUTHORITY TO CHANGE WATER § OF
AND WASTEWATER RATES § ADMINISTRATIVE HEARINGS

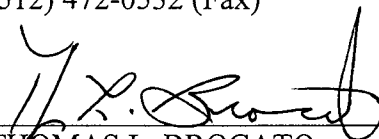
**CITY OF AUSTIN D/B/A AUSTIN WATER'S
RESPONSE TO DISTRICTS'
CORRECTED FOURTH REQUEST FOR INFORMATION**

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 (City) doing business as Austin Water (Austin Water or AW) files its Response 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 Districts (collectively Districts) Corrected Fourth Request for Information (RFI) to Austin Water received on August 30, 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
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(512) 472-0532 (Fax)

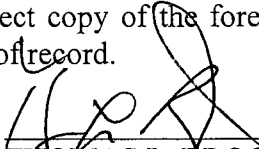

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ATTORNEYS FOR CITY OF AUSTIN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by email on September 19, 2019, to the parties of record.



THOMAS L. BROCATO

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AUSTIN WATER'S RESPONSE TO DISTRICTS'
CORRECTED FOURTH RFI

For requests 4-1 through 4-8 below, please *see* attached Attachment A, City of Austin's Seventh Supplemental Response to Petitioners' Third Request for Production of Documents in Docket No. 42857 at Response to Request No. 3-11 and Request No. 3-12.

DISTRICTS 4-1: Admit or Deny that Austin's response classified water mains 24 inches and greater in diameter as "Transmission."

RESPONSE: Admit. For the City of Austin's Seventh Supplemental Response to Petitioners' Third Request for Production of Documents in Docket No. 42857, Responses to Request Nos. 3-11 and 3-12, Austin Water admits it classified water mains of 24 inches and greater as transmission mains.

Prepared by: David Anders
Sponsored by: David Anders

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AUSTIN WATER'S RESPONSE TO DISTRICTS'
CORRECTED FOURTH RFI

DISTRICTS 4-2: Admit or deny that Austin's response classified water mains less than 24 inches in diameter as "Distribution."

RESPONSE: Admit. For the City of Austin's Seventh Supplemental Response to Petitioners' Third Request for Production of Documents in Docket No. 42857, Responses to Request Nos. 3-11 and 3-12, Austin Water admits it classified water mains less than 24 inches as distribution mains.

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AUSTIN WATER'S RESPONSE TO DISTRICTS'
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DISTRICTS 4-3: Describe in detail why has Austin not disclosed that it redefined Transmission water mains on Table 72-2 of the Docket No. 49189 from the 24" and greater used in Docket No. 42857 to 16" and greater.

RESPONSE: During the course of responding to Districts' RFI No. 4-3, Austin Water discovered that the cost of service model submitted with the original application for Docket No. 49189 included a classification of transmission mains as 16" and greater. This change was an inadvertent change to the classification of transmission and distribution main assets. Austin Water will be filing an errata to correct this classification.

Prepared by: David Anders
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AUSTIN WATER'S RESPONSE TO DISTRICTS'
CORRECTED FOURTH RFI

DISTRICTS 4-4: Describe in detail the basis for Austin's proposed reclassification for purposes of Docket No. 49189.

RESPONSE: See Response to Districts' RFI No. 4-3, above. Austin Water has completed an updated inch-foot analysis on the transmission and distribution mains. AW agrees to adjust the cost of service models submitted with the application in Docket No. 49189 to ensure the 33.52% transmission mains and 66.48% distribution mains are appropriately used to allocate costs. AW plans to provide an errata filing to provide the revenue requirements variance for each of the Districts.

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AUSTIN WATER'S RESPONSE TO DISTRICTS'
CORRECTED FOURTH RFI

DISTRICTS 4-5: Identify and produce all studies and analyses supporting Austin's proposed reclassification.

RESPONSE: See Response to Districts' RFI No. 4-3, above. Austin Water has completed an updated inch-foot analysis on the transmission and distribution mains. AW agrees to adjust the cost of service models submitted with the application in Docket No. 49189 to ensure the 33.52% transmission mains and 66.48% distribution mains is appropriately used to allocate costs. AW plans to provide an errata filing to provide the revenue requirements variance for each of the Districts.

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AUSTIN WATER'S RESPONSE TO DISTRICTS'
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DISTRICTS 4-6: Please provide the revenue requirements for each of the Petitioners based on re-running the AW Water COS Model Docket 49189.xlsx using the classifications of 24" and greater as Transmission Mains and less than 24" as Distribution Mains.

RESPONSE: Austin Water filed an objection to this request on September 9, 2019.

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

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AUSTIN WATER'S RESPONSE TO DISTRICTS'
CORRECTED FOURTH RFI

DISTRICTS 4-7: Please provide the inventory of Water Transmission Mains from 2018 showing length of pipe by diameter.

RESPONSE: Please see the responsive information provided in AW Districts 4-7, Attachment 1. Additionally, AW has updated the inch-foot analysis and percentages for transmission and distribution that are calculated within the schedule.

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Sponsored by: David Anders

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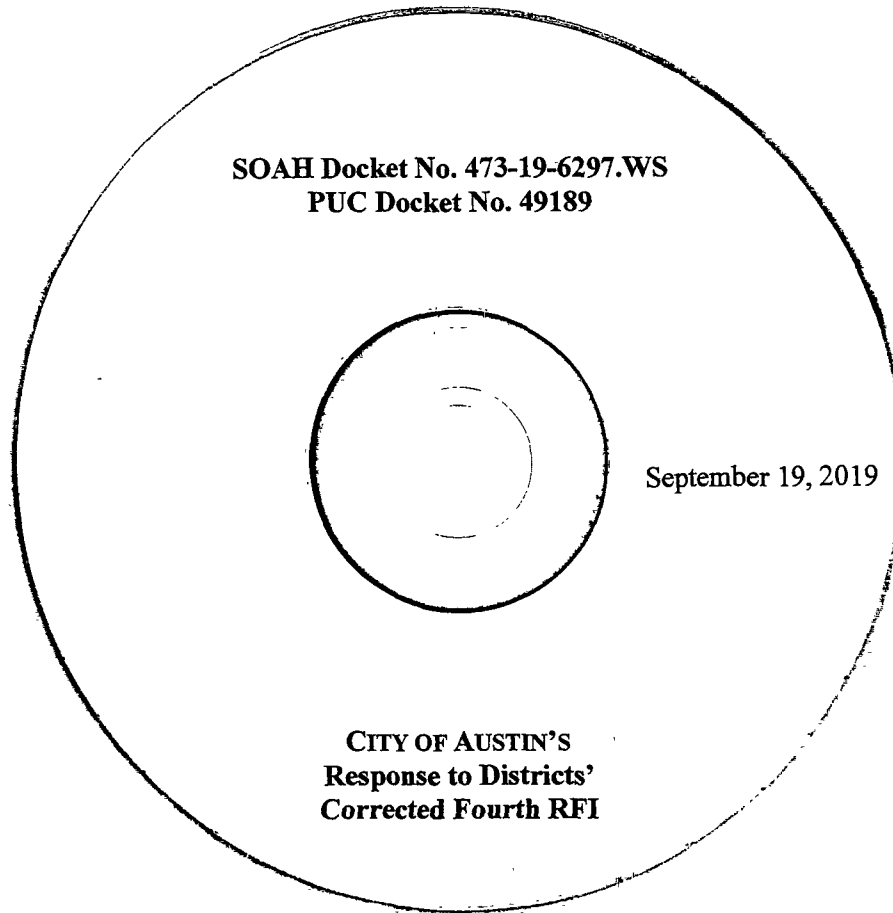
AUSTIN WATER'S RESPONSE TO DISTRICTS'
CORRECTED FOURTH RFI

DISTRICTS 4-8: Please provide the inventory of Water Distribution Mains from 2018 showing length of pipe by diameter.

RESPONSE: Please see the responsive information provided in AW Districts 4-8, Attachment 1. Additionally, AW has updated the inch-foot analysis and percentages for transmission and distribution that are calculated within the schedule.

Prepared by: David Anders
Sponsored by: David Anders

ATTACHMENTS PROVIDED ON CD



AW Districts 4-7, Attachment 1- Water Tr...	9/13/2019 2:00 PM	Microsoft Excel W...	22 KB
AW Districts 4-8, Attachment 1- Water Di...	9/13/2019 2:01 PM	Microsoft Excel W...	25 KB