



Control Number: 49189



Item Number: 63

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**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**

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§
§
§

**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

2019 SEP 20 AM 10:33
PUBLIC UTILITY COMMISSION
FILING CLERK

**COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
QUESTION NOS. STAFF 7-1 THROUGH STAFF 7-14**

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 attorney 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 20, 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 20, 2019 in accordance with 16 Texas Administrative Code § 22.74.



Eleanor D'Ambrosio

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**COMMISSION STAFF'S SEVENTH REQUEST FOR INFORMATION
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DEFINITIONS

- A. "COA," "AW," 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.

- C. "Districts" 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.

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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 7-1 For each of the water facilities in AW's portfolio, please provide the list of fixed assets associated with each facility.
- Staff 7-2 For each of the wastewater facilities in AW's portfolio, please provide the list of fixed assets associated with each facility.
- Staff 7-3 Reference Schedule II-D-1, Line No. 95, Account No. 6250 – Fleet-equipment preventative maintenance, Adjusted Test Year for Water - \$1,795,715. Please provide the general ledger for this account.
- Staff 7-4 Reference Schedule II-D-1, Line No. 95, Account No. 6250 – Fleet-equipment preventative maintenance, Adjusted Test Year for Wastewater - \$2,244,529. Please provide the general ledger for this account.
- Staff 7-5 Reference Schedule II-D-1, Line No. 112, Account No. 6387 – Maintenance-computer hardware, Adjusted Test Year for Water - \$72,542. Please provide the general ledger for this account.
- Staff 7-6 Reference Schedule II-D-1, Line No. 112, Account No. 6387 – Maintenance-computer hardware, Adjusted Test Year for Wastewater - \$72,767. Please provide the general ledger for this account.
- Staff 7-7 Reference Schedule II-D-1, Line No. 113, Account No. 6388 – Maintenance-computer software, Adjusted Test Year for Water - \$1,182,749. Please provide the general ledger for this account.
- Staff 7-8 Reference Schedule II-D-1, Line No. 113, Account No. 6388 – Maintenance-computer hardware, Adjusted Test Year for Wastewater - \$908,653. Please provide the general ledger for this account.
- Staff 7-9 Please refer to AW Water COS Model Docket 49189.
- a. Please reference worksheet 29. For only programs with expenses included in the costs of service for the Districts, please provide a specific description of the programs listed under CONSERVATION & REUSE. Please indicate what customer classes the program affects and how that customer class is affected. Please explain how each program's expenses are reasonable and necessary for provision of water and wastewater service to the Districts.
 - b. Please reference worksheet 1.A. In columns L and M labeled "Notes", for each adjustment labeled "Budget Reduction – no longer in budget", please

explain if the amount associated with that account prior to the adjustment is no longer in the budget or if that amount was reclassified from the account-no-longer-in-the-budget to another account. For example, if the budgeted costs for “Chief Sustainability Officer” were reduced to zero, was there a similar increase to another budget account? Was there a transfer of an actual position? If there is a transfer or similar increase to the budget in another account, please provide the name and account number associated with the increase. Please provide the monetary affects to each account affected in AW’s cost of service (water and wastewater) and to the Districts’ costs of service.

- Staff 7-10 Please identify all costs incurred by AW to deal with the turbidity event that happened in October of 2018, including but not limited to, customer boiled water notices, other notices, bottled water expenses, operations, overtime and related expenses. Please identify the costs by account number and name and amount as included in Schedule II-A, column (c), and AW Water COS Model Docket 49189 in AW’s FY 2018 Actual column.
- Staff 7-11 Please list the number of turbidity issues similar in magnitude to the 2108 event that AW has experienced in the past ten years. Provide the date of each event and a comparison to the turbidity levels experienced in October of 2018.
- Staff 7-12 Reference Schedule II-A-1. Please provide a detailed description for the following accounts: 6165 Water service, 6179 Water Services Interlocal, 6180 Wastewater svcs-interlocal, and 6202 Interdeptl charges. 6203 Interdepartmental Charges, and 6207 Interdeptl chgs-street cut rpr. The description should include services provided, the location and number of customers directly affected by the service, how these services are necessary for provision of water and wastewater to the Districts, and whether or not the services are continuing in nature.
- Staff 7-13 Reference Schedule II-D-6, page 750, line 18 of the application. Please provide the name of the special event for which the equipment rental paid to Freeman Decorating Co. Please provide the amounts included in the wholesale costs of service for the Districts and the account numbers in which the amounts are recorded. Provide an explanation as to why this expense is reasonable and necessary for provision of water and sewer service to the wholesale customers.
- Staff 7-14 Reference Schedule II-D-3.3. Please explain why the membership dues paid to The Metropolitan Water District of Southern California are reasonable and necessary for provision of water and sewer service to the wholesale customers.