



Control Number: 49189



Item Number: 75

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OF

## ADMINISTRATIVE HEARINGS

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Respectfully submitted,



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**COUNSEL FOR DISTRICTS**

**CERTIFICATE OF SERVICE**

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested to all parties on this the 27<sup>th</sup> day of September, 2019.



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John J. Carlton

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

**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'S ELEVENTH  
REQUEST FOR INFORMATION TO CITY OF AUSTIN DBA AUSTIN WATER**

**I.  
DEFINITIONS**

The following definitions apply herein unless otherwise indicated by the content or expressly stated:

1. The words “and” and “or” shall be construed either conjunctively or disjunctively, as required by the context, to bring within the scope of these discovery requests any response or document that might be deemed outside its scope by another construction.
2. “AW” or “Austin Water” means the City of Austin DBA Austin Water.
3. “Communication” shall mean and include every manner or means of transmittal, disclosure, transfer, or exchange of information, and every form of transmission, disclosure, transfer or exchange of information, whether orally, electronically, or by document, and whether face-to-face, by telephone, mail, personal delivery, computer or otherwise.
4. “Concerning,” “relating to,” or “regarding,” and similar terms mean addressing, analyzing, referring, discussing, mentioning in any way, explaining, supporting, describing, forming the basis for, or being logically or casually connected in any way with the subject of these discovery requests.
5. “Describe” or “describe in detail” means to give a complete and full description concerning the matter about which the inquiry is made, including the full name, address, and telephone number(s) of the person(s) involved, dates, times, places, and other particulars, including all relevant documents and observations which make the answers to these written discovery requests fair and meaningful.
6. “Document” means any documents or tangible items made discoverable by Texas Rule of Civil Procedure 192.3, and includes all originals and non-identical copies of any and all documents, papers, books, accounts, writings, drawings, graphs, charts, maps, surveys, photographs, electronic or videotape recordings, electronic mail (e-mail), phone records, recordings, other data compilations from which information can be obtained and translated by you, if necessary, into reasonably useable form and tangible things. *See* Tex. R. Civ. P. 192.3 (2019).
7. To “identify” an individual means to state the following about that individual: (i) the person’s full name; (ii) the person’s job title or former job title; (iii) the person’s job (or

former job) duties and responsibilities; (iv) the individual's superior(s); (v) current or last known telephone number(s); and (vi) current or last known business and home addresses.

8. To "identify" a person as defined herein other than an individual means to provide the following information: (i) the entity's full and correct legal name; (ii) the nature of the entity's structure and/or organization; (iii) the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and (iv) its principal line(s) of business or activity.
9. To "identify" an act, event, occurrence, or communication means the following: (i) to state its date; (ii) to identify the persons that were parties to and/or witnesses of the act, event, occurrence, or communication; (iii) to describe where and how it took place; and (iv) to identify any document that constitutes or refers to such act, event, occurrence, or communication.
10. To "identify" a document means the following: (i) to identify all files in which it and all copies of it are found; (ii) to identify its author; (iii) to identify its addressees, if any; (iv) to identify those persons who received a copy thereof; (v) to identify its current custodian or the person that had last known possession, custody, or control thereof; (vi) to state the date of its preparation; and (vii) to state its general subject matter giving a reasonably detailed description thereof.
11. "Docket 42857" refers to *Petition of the North Austin Municipal Utility District No. 1, Northtown Municipal Utility District, Travis County Water Control and Improvement District No. 10, and Wells Branch Municipal District from the Ratemaking Actions of the City of Austin and Request for Interim Rates in Williamson and Travis Counties*, Docket 42857 (Sept. 5, 2014).
12. "Person" or "Persons" means any natural person, corporation, association, firm, partnership, or other business or legal entity and officers, employees, agents, attorneys, servants or representatives of such entity, as the context requires.
13. "Petitioners" refers to, collectively, 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.
14. "Districts" means and 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.
15. "PUC" or "Commission" refers to the Public Utility Commission of Texas and all predecessor agencies with similar responsibilities, including the Texas Commission on Environmental Quality, Texas Natural Resource Conservation Commission, Texas Water Commission, and Texas Department of Health.
16. "Relate" or "relating to" means making or including a statement about, discussing, describing, reflecting, consisting of, constituting, comprising or in any way concerning in whole or in part the subject or thing.

17. “RFP” means the Rate Filing Package for Class A Water and Sewer Utilities used by the City in this matter.
18. “RFP Requirements” means the Commission’s Minimum Rate Filing Application Requirements for Class A Water and Sewer Utilities.
19. “Service” has the same meaning as defined by Texas Water Code § 13.002(21) (2019).
20. “Statement” means and includes any written or graphic statement signed or otherwise adopted or approved by the user in making it, and stenographic, mechanical, electrical or other recording or transcription thereof, which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.
21. “You” or “your” means and refers to the City of Austin, and any person or entity acting or purporting to act on its behalf, including, without limitation, attorneys, agents, advisors, consultants, investigators, representatives, employees, or other persons.
22. “Employee” means any full-time employee, part-time employee, contract employee working on a temporary or long-term basis, or consultant working for any period of time for the entity.

## **II.**

### **INSTRUCTIONS**

1. These discovery requests must be answered in strict compliance with the orders of the Administrative Law Judge hearing this Docket, the Texas Rules of Civil Procedure, and the rules of the PUC.
2. Your answers to the interrogatories must be answered separately and fully in writing, and the answers must be signed and verified under oath by the person making the answers.
3. In those instances when the responding party chooses to answer an interrogatory by referring to a specific document or record, the specification must be in sufficient detail to permit the requesting party to locate and identify the records and/or documents from which the answer is to be ascertained as readily as the party served with the request.
4. Whenever you are asked in these discovery requests to describe, identify, or produce documents, the term “documents” is not limited to documents in your actual or constructive possession, custody or control (as defined by Texas Rule of Civil Procedure 192.7(b)), but also includes all documents that you know to exist or which have existed, or which you have reason to suspect to be in existence or to have been in existence, irrespective of whether the document is one intended for or transmitted internally by you or intended for or transmitted to any other person or entity, including without limitation any governmental agency, department, administrative entity, or their personnel. *See* Tex. R. Civ. P. 192.7(b).
5. Whenever you are asked in these discovery requests to describe or identify documents that once existed but which no longer exist, in addition to identifying the documents, please indicate the approximate date and the circumstances under which the documents ceased to

exist. Whenever you are asked in these discovery requests to describe or identify documents that are not in your actual or constructive possession, custody, or control, as those terms are defined in Texas Rule of Civil Procedure 192.7(b), please identify (by name, address, and telephone number) the person whom you believe to have such possession, custody, or control. *See id.*

6. If a discovery request calls upon you to state your legal or factual contentions and/or the legal or factual basis for your contentions in this lawsuit, you should respond in accordance with Texas Rule of Civil Procedure 192.3(j). Such requests do not seek to require you to marshal all of your evidence. *See* Tex. R. Civ. P. 192.3(j).
7. As used in these discovery requests, the singular and masculine form of a noun or pronoun includes the plural, feminine, or the neuter form, where appropriate.
8. As used in these discovery requests, the past tense includes the present tense where the express meaning of the request is not distorted by that usage, and the verb form of a noun or pronoun may be used as appropriate in a particular context.

### **III.** **DUTY TO SUPPLEMENT**

You are under a continuing duty to supplement your responses within five days after you obtain information on the basis of which you know that a response either (1) was incorrect or incomplete when submitted or, (2) although correct and complete when submitted, is no longer correct and complete, and the circumstances are such that failure to supplement the response is, in substance, misleading. *See* 16 Tex. Admin. Code § 22.144(i); Tex. R. Civ. P. 193.5(a).

### **IV.** **REQUESTS FOR INFORMATION**

The Commission's *Minimum Rate Filing Application (RFP) Requirements for Class A Water and Sewer Utilities* at pp. 2-3 states that,

**“Testimony and schedules:** The utility shall provide direct testimony in support of its rate filing request and include the required schedules and workpapers with the application filing. Schedules, relevant data, and supporting workpapers (to the extent that the workpapers have been developed in Microsoft Excel) shall be provided in active format, including active Microsoft Excel workbooks and all linked workbooks with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony except where no such workpapers exist. If a utility does not ordinarily link spreadsheets together, there is no need to do so solely for purposes of the RFP; however, if the utility does link spreadsheets, the utility should provide all the linked files. In the event that providing links to information sources is problematic, utilities should use alternative methods of providing the information, such as including the additional information in narrative form or including reference numbers via the use

of “comments” within the spreadsheet cells. All source equations, the means, or the methodology on how any and all calculations were performed must be provided.

The workpapers, workbooks and other information in support of the testimony are not required only if the information is duplicative and provided elsewhere in the filing, provided that the utility provides a specific citation (Bates page number, etc.) to where the workpaper can be found in the RFP. In situations where no supporting workpapers exist, a utility shall affirmatively state that there are no workpapers. **To the extent that information in the cells of Microsoft Excel workbooks is hard-coded, the company shall provide the source of information for the hard-coded data in narrative format by including detailed explanatory information in “comments” within the cells.** [emphasis added]

**DISTRICTS’ REQUEST TO CITY 11-1.** Please refer to Attachment 1 (AW 3-2, Attachment 1.xlsx) of Austin Water’s Response to Districts’ Corrected Third Request for Information, DISTRICTS 3-2:

- a. Please confirm that Joseph Gonzales is AW’s only witness who supports this attachment; if this attachment’s sponsoring witness needs to be modified in AW’s response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS’ REQUEST TO CITY 11-2.** Please refer to Attachment 1 (AW 3-5, Attachment 1.xlsx) of Austin Water’s Response to Districts’ Corrected Third Request for Information, DISTRICTS 3-5:

- a. Please confirm that Joseph Gonzales is AW’s only witness who supports this attachment; if this attachment’s sponsoring witness needs to be modified in AW’s response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).



**DISTRICTS' REQUEST TO CITY 11-3.** Please refer to Attachment 1 (AW 3-5, Attachment 2.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-5:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-4.** Please refer to Attachment 1 (AW 3-6, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-6:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-5.** Please refer to Attachment 1 (AW 3-7, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-7:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-6.** Please refer to Attachment 1 (AW 3-8, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-8:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-7.** Please refer to Attachment 1 (AW 3-17, Attachment 1.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-17:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-8.** Please refer to Attachment 1 (AW 3-21, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-21:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-9.** Please refer to Attachment 1 (AW 3-22, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-22:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-10.** Please refer to Attachment 1 (AW 3-23, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-23:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-11.** Please refer to Attachment 1 (AW 3-24, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-24:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-12.** Please refer to Attachment 1 (AW 3-25, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-25:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-13.** Please refer to Attachment 1 (AW 3-26, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-26:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so

- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-14.** Please refer to Attachment 1 (AW 3-27, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-27:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-15.** Please refer to Attachment 1 (AW 3-28, Attachment 1.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-28:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application

- ii. Identify the source of any non-superfluous information or data:
  - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-16.** Please refer to Attachment 1 (AW 3-28, Attachment 2.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-28:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-17.** Please refer to Attachment 1 (AW 3-28, Attachment 3.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-28:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.

- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
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  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-18.** Please refer to Attachment 1 (AW 3-33, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-33:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-19.** Please refer to Attachment 1 (AW 3-33, Attachment 2.xlsm) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-33:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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**DISTRICTS' REQUEST TO CITY 11-20.** Please refer to Attachment 1 (AW 3-37, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-37:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-21.** Please refer to Attachment 1 (AW 3-38, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsx does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).



**DISTRICTS' REQUEST TO CITY 11-22.**

Please refer to Attachment 1 (AW 3-38, Attachment 2.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-23.**

Please refer to Attachment 1 (AW 3-38, Attachment 3.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
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  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-24.** Please refer to Attachment 1 (AW 3-38, Attachment 4.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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**DISTRICTS' REQUEST TO CITY 11-25.** Please refer to Attachment 1 (AW 3-38, Attachment 5.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,

- i. Identify any information or data in this document that is superfluous to the Application
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**DISTRICTS' REQUEST TO CITY 11-26.** Please refer to Attachment 1 (AW 3-38, Attachment 6.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-27.** Please refer to Attachment 1 (AW 3-38, Attachment 7.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.

- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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**DISTRICTS' REQUEST TO CITY 11-28.** Please refer to Attachment 1 (AW 3-38, Attachment 8.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
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**DISTRICTS' REQUEST TO CITY 11-29.** Please refer to Attachment 1 (AW 3-38, Attachment 9.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.

- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
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**DISTRICTS' REQUEST TO CITY 11-30.** Please refer to Attachment 1 (AW 3-38, Attachment 10.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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**DISTRICTS' REQUEST TO CITY 11-31.**

Please refer to Attachment 1 (AW 3-38, Attachment 11.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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**DISTRICTS' REQUEST TO CITY 11-32.**

Please refer to Attachment 1 (AW 3-38, Attachment 12.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-33.** Please refer to Attachment 1 (AW 3-38, Attachment 13.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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**DISTRICTS' REQUEST TO CITY 11-34.** Please refer to Attachment 1 (AW 3-38, Attachment 14.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,

- i. Identify any information or data in this document that is superfluous to the Application
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**DISTRICTS' REQUEST TO CITY 11-35.** Please refer to Attachment 1 (AW 3-38, Attachment 15.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsx does this attachment support? If none, please so state.
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- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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**DISTRICTS' REQUEST TO CITY 11-36.** Please refer to Attachment 1 (AW 3-38, Attachment 16.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsx does this attachment support? If none, please so state.



- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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**DISTRICTS' REQUEST TO CITY 11-37.** Please refer to Attachment 1 (AW 3-38, Attachment 17.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
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**DISTRICTS' REQUEST TO CITY 11-38.** Please refer to Attachment 1 (AW 3-38, Attachment 18.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.

- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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**DISTRICTS' REQUEST TO CITY 11-39.** Please refer to Attachment 1 (AW 3-38, Attachment 19.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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**DISTRICTS' REQUEST TO CITY 11-40.**

Please refer to Attachment 1 (AW 3-38, Attachment 20.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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**DISTRICTS' REQUEST TO CITY 11-41.**

Please refer to Attachment 1 (AW 3-38, Attachment 21.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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- e. If this is a PDF document,
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**DISTRICTS' REQUEST TO CITY 11-42.** Please refer to Attachment 1 (AW 3-38, Attachment 22.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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- e. If this is a PDF document,
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**DISTRICTS' REQUEST TO CITY 11-43.** Please refer to Attachment 1 (AW 3-38, Attachment 23.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
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- e. If this is a PDF document,

- i. Identify any information or data in this document that is superfluous to the Application
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**DISTRICTS' REQUEST TO CITY 11-44.** Please refer to Attachment 1 (AW 3-38, Attachment 24.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
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**DISTRICTS' REQUEST TO CITY 11-45.** Please refer to Attachment 1 (AW 3-38, Attachment 25.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsx does this attachment support? If none, please so state.

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**DISTRICTS' REQUEST TO CITY 11-46.** Please refer to Attachment 1 (AW 3-38, Attachment 26.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
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  - i. Identify any information or data in this document that is superfluous to the Application
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**DISTRICTS' REQUEST TO CITY 11-47.** Please refer to Attachment 1 (AW 3-38, Attachment 27.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.

- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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    - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-48.** Please refer to Attachment 1 (AW 3-38, Attachment 28.pdf) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-38:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-49.**

Please refer to Attachment 1 (AW 3-39, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-39:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

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**DISTRICTS' REQUEST TO CITY 11-50.**

Please refer to Attachment 1 (AW 3-40, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-40:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer



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**DISTRICTS' REQUEST TO CITY 11-51.** Please refer to Attachment 1 (AW 3-40, Attachment 2.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-40:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-52.** Please refer to Attachment 1 (AW 3-42, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-42:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-53.** Please refer to Attachment 1 (AW 3-42, Attachment 2.xls) of Austin Water's Response to Districts' Corrected Third Request for Information, DISTRICTS 3-42:

- a. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so

- b. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-54.** Please refer to Attachment 1 (AW 4-7, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Fourth Request for Information, DISTRICTS 4-7:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-55.** Please refer to Attachment 1 (AW 4-8, Attachment 1.xlsx) of Austin Water's Response to Districts' Corrected Fourth Request for Information, DISTRICTS 4-8:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.

- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**DISTRICTS' REQUEST TO CITY 11-56.** Please refer to Attachment 1 (AW 5-1, Attachment 1.pdf) of Austin Water's Response to Districts' Corrected Fifth Request for Information, DISTRICTS 5-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that Joseph Gonzales is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    - 1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).