

Control Number: 49189



Item Number: 91

Addendum StartPage: 0

O. 49189
73-19-6297.WS
2010 OCT -6 PM 12:10

OF

DISTRICTS' 7TH AND 8TH REQUESTS FOR INFORMATION

COME NOW, 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 (the “Districts”) and file this Motion to Compel Responses to Districts’ Seventh and Eighth Requests for Information to the City of Austin (“City”), which were served on the City on September 20, 2019. This Motion to Compel is filed within five days of and in response to City’s Objections to Districts’ Seventh and Eighth Requests for Information to the City, which were both filed by the City on Monday, September 30, 2019. Therefore, this Motion to Compel is timely. In support of this Motion, Districts respectfully show the following:

I. BACKGROUND

Districts filed their Seventh and Eighth Requests for Information on the City on September 20, 2019 (“Requests”). The Requests generally sought information related to the City’s prior responses to Districts’ Requests for Information.

A party may obtain discovery regarding any matter that is not privileged and is relevant to the subject matter of the pending action, and may obtain discovery of information that is reasonably

calculated to lead to the discovery of admissible evidence.¹ Districts' Requests were intended to be comprehensive and provide meaningful responses in advance of Districts' deadline to file testimony in this case (October 18, 2019).

The City objected to Districts' Requests and the Districts timely file a Motion to Compel because the Districts are entitled to responses to their requests.

II. RESPONSE TO CITY'S OBJECTIONS

A. City repeated the following objections for Districts' Seventh and Eighth Request for Information.²

1. **DEFINITION NO. 6:** "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.

Objections:

Austin Water objects to this definition because it is unduly burdensome, unreasonable, and meant for the purpose of harassing Austin Water. ... Notwithstanding this objection, Austin Water will provide a response to each request using the commonly understood meaning of the term.

City cites 16 TAC § 22.142(a)(1)(D) and Tex. R. Civ. Proc. 192.4 as the bases for its objections. As the Districts have previously argued, City bears the burden of proof in this matter as the applicant for approval of an increase in its wholesale rates to Districts. As the ALJs are aware, City pressed for an extremely compressed schedule in this matter. City's rate filing package and direct case in this matter consists of 3,731 pages of materials, and the City's response to discovery in this matter now entails 190 documents of 9,129 pages, and 84 spreadsheets with 618 tabs. Districts' discovery Requests properly seek to discover the bases for City's rate request, which Districts expect to require City to produce detailed responses. District's Seventh and Eighth Requests include a definition of "Describe" or "describe in detail" to make clear what information Districts are requesting.

¹ Tex. R. Civ. Proc. 192.3; 16 TAC § 22.141(a).

² See generally District's Motion to Compel City of Austin to Respond to Districts' 1ST and 2ND Requests for Information, Docket No. 49189, Item 62; Districts' Motion to Compel City of Austin to Respond to Districts' 3RD, 4TH, and 5TH Requests for Information, Docket No. 49189, Item 57; Districts' Motion to Compel City of Austin to Respond to Districts' 6TH Request for Information, Docket No. 49189, Item 83.

If the ALJs were to sustain City's objection to this definition, City could simply respond with non-specific and evasive answers that effectively shift the burden of proof to Districts to scour City's own, admittedly voluminous, documentation in order to locate "a needle in a haystack." Districts need this information to understand City's Application to prepare their direct case.

In the prior wholesale rate appeal, the Commission found that:

Based on Disk 1 and the city's direct case, Districts' expert witness attempted to evaluate the city's rates by starting from the assumption that the data entries in the city's inactive Excel spreadsheets were valid. After spending 500 hours and at a cost of nearly \$100,000, Districts' expert and his team reverse-engineered the inactive Excel spreadsheets to create active spreadsheets that they used to guess the formulas and bases for the underlying data. The reverse-engineered Excel spreadsheets still contained the city's data entries and assumed their validity.³

City's objections in this matter follow the same pattern as Docket No. 42857. Districts should not be forced to reconstruct City's case in order to evaluate City's assertions regarding the calculations of its wholesale rates. The burden of that proof, and the cost, rests squarely on City.

City's statement that "[n]otwithstanding this objection, Austin Water will provide a response to each request using the commonly understood meaning of the term" violates the requirements of Tex. R. Civ. Proc. 193.2(a), which requires that "[t]he party must state specifically the legal or factual basis for the objection and the extent to which the party is refusing to comply with the request."⁴ Merely stating that the City will comply with the request "using the commonly understood meaning of the term" fails to specifically state the basis for the objection to which City is refusing to comply.⁵ Sustaining the objection would leave the determination of what is legally responsive up to City's biased interpretation.

It is unclear from City's objections, but to the extent that City is objecting to having to "Describe" documents as part of the definition of "Identify," Counsel for Districts previously offered to modify the definition of "Identify," as discussed in detail below, to track the Commission's requirements for indices of voluminous materials.⁶ City did not agree, and now

³ Order on Rehearing, Docket No. 42857, Item 344, p. 22, Finding of Fact 45.

⁴ Tex. R. Civ. Proc. 192.3(a); 16 TAC § 22.141(a).

⁵ Objections of Austin Water to Districts' Seventh Request for Information, Docket No. 49189, Item 79, p. 3; Objections of Austin Water to Districts' Eighth Request for Information, Docket No. 49189, Item 78, p. 2.

⁶ 16 TAC § 22.144(h)(4).

files objections to Districts' definitions of "Describe" and "Identify". Furthermore, Districts anticipate that City will not file an adequate index of voluminous materials in response to Districts' Seventh and Eighth Requests, because the City has failed to do so in its responses to Districts' First, Second, Third, Fourth, Fifth, and Sixth Requests, despite City admitting that the responsive documents are voluminous.⁷ Commission Procedural Rules 22.144(h)(4) requires:

(4) The party providing the voluminous material shall file with its response a detailed index of the voluminous material responsive to a particular question and shall organize the responses and material to enable parties to efficiently review the material, including labeling of material by request for information number and subparts and sequentially numbering the material responsive to a particular question. The index shall include:

- (A) information sufficient to locate each individual document by page number, file number, and box number;
- (B) the date of each document;
- (C) the title of the document, or, if none exists, a description of the document;
- (D) the name of the preparer of each document; and
- (E) the length of each document.⁸

City's responses to Districts' First, Second, Third, Fourth, Fifth and Sixth Requests merely contains an image of the DVD with a list of the file names included on the DVD, which City has asserted in negotiations is sufficient. Copies of the relevant pages from City's responses to Districts' First, Second, Third, Fourth, Fifth, and Sixth Requests are attached to this Motion as Exhibits "A," "B," "C," "D," "E," and "F."⁹

⁷ See City of Austin D/B/A Austin Water's Response to Districts' First Request for Information, Docket No. 49189, Item 39, p. 14, and City of Austin D/B/A Austin Water's Response to Districts' Second Request for Information, Docket No. 49189, Item 47, p. 8.

⁸ 16 Tex. Admin. Code 22.144(h)(4).

⁹ See City of Austin D/B/A Austin Water's Response to Districts' First Request for Information, Docket No. 49189, Item 39, p. 14; City of Austin D/B/A Austin Water's Response to Districts' Second Request for Information, Docket No. 49189, Item 47, p. 8; City of Austin D/B/A/ Austin Water's Response to District's Corrected Third Request for Information, Docket No. 49189, Item 59, p. 48; City of Austin D/B/A/ Austin Water's Response to District's Corrected Fourth Request for Information, Docket No. 49189, Item 60, p. 11; City of Austin D/B/A/ Austin Water's Response to District's Corrected Fifth Request for Information, Docket No. 49189, Item 61, p. 8; City of Austin D/B/A/ Austin Water's Response to District's Sixth Request for Information, Docket No. 49189, Item 85, p. 55., also attached as Exhibits "A," "B," "C," "D," "E," and "F."

Furthermore, in City's Response to Intervenor's Motion to Compel Responses to Intervenor's First and Second Requests for Information, City asserts that the title of the documents provided on the discs "is readily apparent, and each document is completely distinguishable from all others."¹⁰ On a single DVD, the index of the files provided via the City's Response to District's Corrected Third Request, there are seven different documents that are entitled "AW Districts 3-38, Attachment [No.]-Lobbying.pdf" and five different documents entitled "AW Districts 3-38, Attachment [No.]-Membership Questions from Austin Water.pdf."¹¹ Furthermore, 112 documents from the City's Response to Districts' First and Second Requests used the same format without further explanation: "AW [Request Number], Attachment [Number]."¹² The way that the City titled these documents gives no indication of what is contained in them. The City has not complied with the rule: the individual documents are impossible to distinguish from one another and 12 of them have a duplicate title.

Districts urge the ALJs to overrule City's objections to Districts' instructions related to describing its responses in detail and compel the City to fully respond to Districts' Requests.

2. **DEFINITION NO. 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 addresses, 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,

Objections:

Austin Water objects to this definition because it is unduly burdensome, unreasonable, and meant for the purpose of harassing Austin Water. ... Notwithstanding this objection, Austin Water will provide a response to each request using the commonly understood meaning of the term.

City cites 16 TAC § 22.142(a)(1)(D) and Tex. R. Civ. Proc. 192.4 as the bases for its objections. However, City bears the burden of proof in this matter as the applicant for approval of an increase in its wholesale rates to Districts. Counsel for Districts offered to modify the definition

¹⁰ City of Austin D/B/A Austin Water's Response to Districts' Motion to Compel Responses to Districts' First and Second Requests for Information, Docket No. 49189, Item 73, p. 3.

¹¹ See City of Austin D/B/A/ Austin Water's Response to District's Corrected Third Request for Information, Docket No. 49189, Item 59, p. 48.

¹² City of Austin D/B/A Austin Water's Response to Districts' First Request for Information, Docket No. 49189, Item 39, p. 14; City of Austin D/B/A Austin Water's Response to Districts' Second Request for Information, Docket No. 49189, Item 47, p. 8.

of “Identify” to track the Commission’s requirements for indices of voluminous materials as found in 16 Tex. Admin. Code 22.144(h)(4). City did not agree, and now files objections to Districts’ definition of “Identify.” Furthermore, Districts anticipate that City will not file an adequate index of voluminous materials in response to Districts’ Seventh and Eighth Requests, because the City has failed to do so in its responses to Districts’ First, Second, Third, Fourth, Fifth, and Sixth Requests, despite the City admitting that the responsive documents are voluminous.¹³ Commission Procedural Rules 22.144(h)(4) requires:

(4) The party providing the voluminous material shall file with its response a detailed index of the voluminous material responsive to a particular question and shall organize the responses and material to enable parties to efficiently review the material, including labeling of material by request for information number and subparts and sequentially numbering the material responsive to a particular question. The index shall include:

- (A) information sufficient to locate each individual document by page number, file number, and box number;
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City’s responses to Districts’ First, Second, Third, Fourth, Fifth and Sixth Requests merely contains an image of the DVD with a list of the file names included on the DVD, which City has asserted in negotiations is sufficient. Copies of the relevant pages from City’s responses to Districts’ First, Second, Third, Fourth, Fifth, and Sixth Requests are attached to this Motion as Exhibits “A,” “B,” “C,” “D,” “E,” and “F.”¹⁵

¹³ See City of Austin D/B/A Austin Water’s Response to Districts’ First Request for Information, Docket No. 49189, Item 39, p. 14, and City of Austin D/B/A Austin Water’s Response to Districts’ Second Request for Information, Docket No. 49189, Item 47, p. 8.

¹⁴ 16 Tex. Admin. Code 22.144(h)(4); 16 TAC § 22.141(a).

¹⁵ See City of Austin D/B/A Austin Water’s Response to Districts’ First Request for Information, Docket No. 49189, Item 39, p. 14; City of Austin D/B/A Austin Water’s Response to Districts’ Second Request for Information, Docket No. 49189, Item 47, p. 8; City of Austin D/B/A/ Austin Water’s Response to District’s Corrected Third Request for Information, Docket No. 49189, Item 59, p. 48; City of Austin D/B/A/ Austin Water’s Response to District’s Corrected Fourth Request for Information, Docket No. 49189, Item 60, p. 11; City of Austin D/B/A/ Austin Water’s Response to District’s Corrected Fifth Request for Information, Docket No. 49189, Item 61, p. 8; City of Austin D/B/A/ Austin Water’s Response to District’s Sixth Request for Information, Docket No. 49189, Item 85, p. 55., also attached as Exhibits “A,” “B,” “C,” “D,” “E,” and “F.”

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Districts urge the ALJs to overrule City's objections to Districts' instructions related to identifying responsive documents and compel the City to fully respond to Districts' Requests. Alternatively, Districts request that the ALJs order City to provide an index to the voluminous documents that are produced for Districts' Seventh and Eighth Requests as required by 16 Tex. Admin. Code 22.144(h)(4).

III. PRAYER

WHEREFORE, PREMISES CONSIDERED, Districts 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 pray that the Administrative Law Judges issue an Order Compelling the City to respond to Districts' Seventh Request for Information and Eighth Request for Information and grant Districts other such relief to which they may be entitled.

¹⁶ City of Austin D/B/A Austin Water's Response to Districts' Motion to Compel Responses to Districts' First and Second Requests for Information, Docket No. 49189, Item 73, p. 3.

¹⁷ See City of Austin D/B/A/ Austin Water's Response to District's Corrected Third Request for Information, Docket No. 49189, Item 59, p. 48.

¹⁸ City of Austin D/B/A Austin Water's Response to Districts' First Request for Information, Docket No. 49189, Item 39, p. 14; City of Austin D/B/A Austin Water's Response to Districts' Second Request for Information, Docket No. 49189, Item 47, p. 8.

Respectfully submitted,



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ATTORNEYS 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 3rd day of October, 2019.



John J. Carlton

Exhibit A

VOLUMINOUS ATTACHMENTS
PROVIDED ON CD



 AW_1-2_Attachment_1.pdf
 AW_1-3(4)(A)_Attachment_1.pdf
 AW_1-3(4)(A)_Attachment_2.pdf
 AW_1-3(4)(A)_Attachment_3.pdf
 AW_1-3(4)(A)_Attachment_4.pdf
 AW_1-3(4)(A)_Attachment_5.pdf
 AW_1-3(4)(A)_Attachment_6.pdf
 AW_1-7_Attachment_1.PDF

VOLUMINOUS ATTACHMENTS PROVIDED ON CD

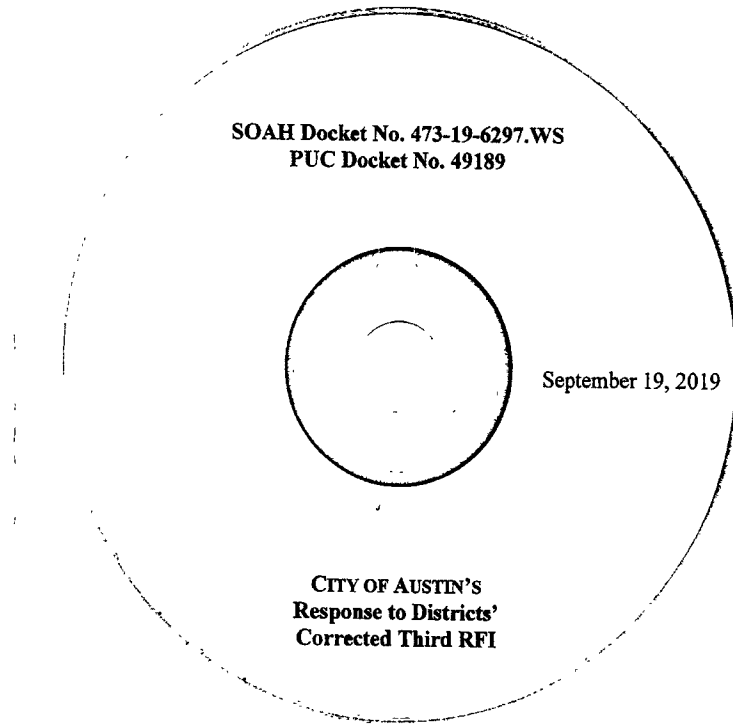


**CITY OF AUSTIN'S
Response to Districts'
Second RFI**

- | | | | | |
|--------------------------------|--------------------------------|---------------------------------|--|--|
| 1) NY 2-1, Attachment 1.pdf | 2) NY 2-1, Attachment 41.pdf | 3) NY 2-1, Attachment 84.pdf | 4) NY 2-1, Attachment 121-New Plans M&B, 10/2/04 | 5) NY 2-1, Attachment 122-Schedule 8-B-1, Unpublished, Support.doc |
| 6) NY 2-1, Attachment 2.pdf | 7) NY 2-1, Attachment 42.pdf | 8) NY 2-1, Attachment 82.pdf | 9) NY 2-1, Attachment 123-Schedule 8-B-1, Working Sheet | 10) NY 2-1, Attachment 124-Schedule 8-B-1, Working Sheet |
| 11) NY 2-1, Attachment 3.pdf | 12) NY 2-1, Attachment 43.pdf | 13) NY 2-1, Attachment 83.pdf | 14) NY 2-1, Attachment 125-Schedule 8-B-1, Support, Final.doc | 15) NY 2-1, Attachment 126-Schedule 8-B-1, Support, Final.doc |
| 16) NY 2-1, Attachment 4.pdf | 17) NY 2-1, Attachment 44.pdf | 18) NY 2-1, Attachment 84.pdf | 19) NY 2-1, Attachment 127-Schedule 8-B-1, Support, Final.doc | 20) NY 2-1, Attachment 128-Schedule 8-B-1, Support, Final.doc |
| 21) NY 2-1, Attachment 5.pdf | 22) NY 2-1, Attachment 45.pdf | 23) NY 2-1, Attachment 85.pdf | 24) NY 2-1, Attachment 129-Schedule 8-B-1, Support, Final.doc | 25) NY 2-1, Attachment 130-Schedule 8-B-1, Support, Final.doc |
| 26) NY 2-1, Attachment 6.pdf | 27) NY 2-1, Attachment 46.pdf | 28) NY 2-1, Attachment 86.pdf | 29) NY 2-1, Attachment 131-Schedule 8-B-1, Support, Final.doc | 30) NY 2-1, Attachment 132-Schedule 8-B-1, Support, Final.doc |
| 31) NY 2-1, Attachment 7.pdf | 32) NY 2-1, Attachment 47.pdf | 33) NY 2-1, Attachment 87.pdf | 34) NY 2-1, Attachment 133-Schedule 8-B-1, Support, Final.doc | 35) NY 2-1, Attachment 134-Schedule 8-B-1, Support, Final.doc |
| 36) NY 2-1, Attachment 8.pdf | 37) NY 2-1, Attachment 48.pdf | 38) NY 2-1, Attachment 88.pdf | 39) NY 2-1, Attachment 135-Schedule 8-B-1, Support, Final.doc | 40) NY 2-1, Attachment 136-Schedule 8-B-1, Support, Final.doc |
| 41) NY 2-1, Attachment 9.pdf | 42) NY 2-1, Attachment 49.pdf | 43) NY 2-1, Attachment 89.pdf | 44) NY 2-1, Attachment 137-Schedule 8-B-1, Support, Final.doc | 45) NY 2-1, Attachment 138-Schedule 8-B-1, Support, Final.doc |
| 46) NY 2-1, Attachment 10.pdf | 47) NY 2-1, Attachment 50.pdf | 48) NY 2-1, Attachment 90.pdf | 49) NY 2-1, Attachment 139-Schedule 8-B-1, Support, Final.doc | 50) NY 2-1, Attachment 140-Schedule 8-B-1, Support, Final.doc |
| 51) NY 2-1, Attachment 11.pdf | 52) NY 2-1, Attachment 51.pdf | 53) NY 2-1, Attachment 91.pdf | 54) NY 2-1, Attachment 141-Schedule 8-B-1, Support, Final.doc | 55) NY 2-1, Attachment 142-Schedule 8-B-1, Support, Final.doc |
| 56) NY 2-1, Attachment 12.pdf | 57) NY 2-1, Attachment 52.pdf | 58) NY 2-1, Attachment 92.pdf | 59) NY 2-1, Attachment 143-Schedule 8-B-1, Support, Final.doc | 60) NY 2-1, Attachment 144-Schedule 8-B-1, Support, Final.doc |
| 61) NY 2-1, Attachment 13.pdf | 62) NY 2-1, Attachment 53.pdf | 63) NY 2-1, Attachment 93.pdf | 64) NY 2-1, Attachment 145-Schedule 8-B-1, Support, Final.doc | 65) NY 2-1, Attachment 146-Schedule 8-B-1, Support, Final.doc |
| 66) NY 2-1, Attachment 14.pdf | 67) NY 2-1, Attachment 54.pdf | 68) NY 2-1, Attachment 94.pdf | 69) NY 2-1, Attachment 147-Schedule 8-B-1, Support, Final.doc | 70) NY 2-1, Attachment 148-Schedule 8-B-1, Support, Final.doc |
| 71) NY 2-1, Attachment 15.pdf | 72) NY 2-1, Attachment 55.pdf | 73) NY 2-1, Attachment 95.pdf | 74) NY 2-1, Attachment 149-Schedule 8-B-1, Support, Final.doc | 75) NY 2-1, Attachment 150-Schedule 8-B-1, Support, Final.doc |
| 76) NY 2-1, Attachment 16.pdf | 77) NY 2-1, Attachment 56.pdf | 78) NY 2-1, Attachment 96.pdf | 79) NY 2-1, Attachment 151-Schedule 8-B-1, Support, Final.doc | 80) NY 2-1, Attachment 152-Schedule 8-B-1, Support, Final.doc |
| 81) NY 2-1, Attachment 17.pdf | 82) NY 2-1, Attachment 57.pdf | 83) NY 2-1, Attachment 97.pdf | 84) NY 2-1, Attachment 153-Schedule 8-B-1, Support, Final.doc | 85) NY 2-1, Attachment 154-Schedule 8-B-1, Support, Final.doc |
| 86) NY 2-1, Attachment 18.pdf | 87) NY 2-1, Attachment 58.pdf | 88) NY 2-1, Attachment 98.pdf | 89) NY 2-1, Attachment 155-Schedule 8-B-1, Support, Final.doc | 90) NY 2-1, Attachment 156-Schedule 8-B-1, Support, Final.doc |
| 91) NY 2-1, Attachment 19.pdf | 92) NY 2-1, Attachment 59.pdf | 93) NY 2-1, Attachment 99.pdf | 94) NY 2-1, Attachment 157-Schedule 8-B-1, Support, Final.doc | 95) NY 2-1, Attachment 158-Schedule 8-B-1, Support, Final.doc |
| 96) NY 2-1, Attachment 20.pdf | 97) NY 2-1, Attachment 60.pdf | 98) NY 2-1, Attachment 100.pdf | 99) NY 2-1, Attachment 159-Schedule 8-B-1, Support, Final.doc | 100) NY 2-1, Attachment 160-Schedule 8-B-1, Support, Final.doc |
| 101) NY 2-1, Attachment 21.pdf | 102) NY 2-1, Attachment 61.pdf | 103) NY 2-1, Attachment 101.pdf | 104) NY 2-1, Attachment 161-Schedule 8-B-1, Support, Final.doc | 105) NY 2-1, Attachment 162-Schedule 8-B-1, Support, Final.doc |
| 106) NY 2-1, Attachment 22.pdf | 107) NY 2-1, Attachment 62.pdf | 108) NY 2-1, Attachment 102.pdf | 109) NY 2-1, Attachment 163-Schedule 8-B-1, Support, Final.doc | 110) NY 2-1, Attachment 164-Schedule 8-B-1, Support, Final.doc |
| 111) NY 2-1, Attachment 23.pdf | 109) NY 2-1, Attachment 63.pdf | 109) NY 2-1, Attachment 103.pdf | 111) NY 2-1, Attachment 165-Schedule 8-B-1, Support, Final.doc | 112) NY 2-1, Attachment 166-Schedule 8-B-1, Support, Final.doc |
| 116) NY 2-1, Attachment 24.pdf | 110) NY 2-1, Attachment 64.pdf | 110) NY 2-1, Attachment 104.pdf | 113) NY 2-1, Attachment 167-Schedule 8-B-1, Support, Final.doc | 114) NY 2-1, Attachment 168-Schedule 8-B-1, Support, Final.doc |
| 121) NY 2-1, Attachment 25.pdf | 111) NY 2-1, Attachment 65.pdf | 111) NY 2-1, Attachment 105.pdf | 115) NY 2-1, Attachment 169-Schedule 8-B-1, Support, Final.doc | 116) NY 2-1, Attachment 170-Schedule 8-B-1, Support, Final.doc |
| 126) NY 2-1, Attachment 26.pdf | 112) NY 2-1, Attachment 66.pdf | 112) NY 2-1, Attachment 106.pdf | 117) NY 2-1, Attachment 171-Schedule 8-B-1, Support, Final.doc | 118) NY 2-1, Attachment 172-Schedule 8-B-1, Support, Final.doc |
| 131) NY 2-1, Attachment 27.pdf | 113) NY 2-1, Attachment 67.pdf | 113) NY 2-1, Attachment 107.pdf | 119) NY 2-1, Attachment 173-Schedule 8-B-1, Support, Final.doc | 120) NY 2-1, Attachment 174-Schedule 8-B-1, Support, Final.doc |
| 136) NY 2-1, Attachment 28.pdf | 114) NY 2-1, Attachment 68.pdf | 114) NY 2-1, Attachment 108.pdf | 121) NY 2-1, Attachment 175-Schedule 8-B-1, Support, Final.doc | 122) NY 2-1, Attachment 176-Schedule 8-B-1, Support, Final.doc |
| 141) NY 2-1, Attachment 29.pdf | 115) NY 2-1, Attachment 69.pdf | 115) NY 2-1, Attachment 109.pdf | 123) NY 2-1, Attachment 177-Schedule 8-B-1, Support, Final.doc | 124) NY 2-1, Attachment 178-Schedule 8-B-1, Support, Final.doc |
| 146) NY 2-1, Attachment 30.pdf | 116) NY 2-1, Attachment 70.pdf | 116) NY 2-1, Attachment 110.pdf | 125) NY 2-1, Attachment 179-Schedule 8-B-1, Support, Final.doc | 126) NY 2-1, Attachment 180-Schedule 8-B-1, Support, Final.doc |
| 151) NY 2-1, Attachment 31.pdf | 117) NY 2-1, Attachment 71.pdf | 117) NY 2-1, Attachment 111.pdf | 127) NY 2-1, Attachment 181-Schedule 8-B-1, Support, Final.doc | 128) NY 2-1, Attachment 182-Schedule 8-B-1, Support, Final.doc |
| 156) NY 2-1, Attachment 32.pdf | 118) NY 2-1, Attachment 72.pdf | 118) NY 2-1, Attachment 112.pdf | 129) NY 2-1, Attachment 183-Schedule 8-B-1, Support, Final.doc | 130) NY 2-1, Attachment 184-Schedule 8-B-1, Support, Final.doc |
| 161) NY 2-1, Attachment 33.pdf | 119) NY 2-1 | | | |

Exhibit C

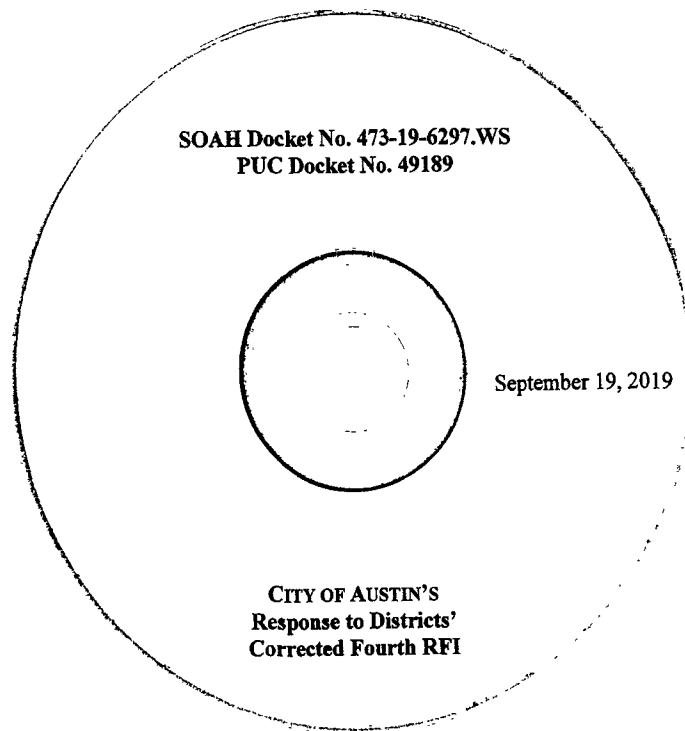
VOLUMINOUS ATTACHMENTS PROVIDED ON CD



- AW Districts 3-2, Attachment 1- WTP#4 Yearly Operations and Maintenance Costs.xlsx
- AW Districts 3-5, Attachment 1 Schedule II-A-1, Reconciliation.xlsx
- AW Districts 3-5, Attachment 1 Schedule II-A-2 Statement of Income, REVISED.xlsx
- AW Districts 3-6, Attachment 1 Schedule II-A-2 Reconciliation.xlsx
- AW Districts 3-7, Attachment 1 Schedule II-A-2 (V), Reconciliation.xlsx
- AW Districts 3-8, Attachment 1 Schedule II-A-2 (VW), Reconciliation.xlsx
- AW Districts 3-17, Attachment 1- OS&M Statement 25.pdf
- AW Districts 3-21, Attachment 1 Schedule II-A-2 Audited Reconciliation.xlsx
- AW Districts 3-22, Attachment 1 Schedule II-A-2 (V), Audited Reconciliation.xlsx
- AW Districts 3-23, Attachment 1 Schedule II-A-2 (VW), Audited Reconciliation.xlsx
- AW Districts 3-24, Attachment 1 Schedule II-A-2 Audited Reconciliation.xlsx
- AW Districts 3-25, Attachment 1 Schedule II-A-3 Other Investments.xlsx
- AW Districts 3-26, Attachment 1 Schedule II-A-3 Special Cash Account.xlsx
- AW Districts 3-27, Attachment 1 Schedule II-A-3 Physical Assets.xlsx
- AW Districts 3-28, Attachment 1 Executed Ordinance 940015-A.pdf
- AW Districts 3-28, Attachment 2 Executed Ordinance 940018-D.pdf
- AW Districts 3-28, Attachment 3 Executed Ordinance 0006009-58A.pdf
- AW Districts 3-33, Attachment 1 Schedule II-A-3.12 Unappropriated Retained Earnings.xlsx
- AW Districts 3-33, Attachment 2-FS0618_Final_FY18.xlsx
- AW Districts 3-37, Attachment 1.xlsx
- AW Districts 3-38, Attachment 1 Schedule II-D-3.3 REVISED.xlsx
- AW Districts 3-38, Attachment 2 Membership Information.pdf
- AW Districts 3-38, Attachment 3 Membership Information.pdf
- AW Districts 3-38, Attachment 4 PW, AGS Membership Information.pdf
- AW Districts 3-38, Attachment 5 (AGS International) Re Membership Information.pdf
- AW Districts 3-38, Attachment 6 AGS - Contact us email from Deborah O'Metres at City of Austin, Austin Water.pdf
- AW Districts 3-38, Attachment 7 American Waterworks Association lobbying costs.pdf
- AW Districts 3-38, Attachment 8 Lobbying Cost.pdf
- AW Districts 3-38, Attachment 9 Association of Metropolitan Water Agencies lobbying costs.pdf
- AW Districts 3-38, Attachment 10 Membership & Lobbying Costs - Compressed Gas Association .pdf
- AW Districts 3-38, Attachment 11 Membership & Lobbying Costs.pdf
- AW Districts 3-38, Attachment 12 Lobbying.pdf
- AW Districts 3-38, Attachment 13 - dues used for lobbying Membership Cost for Austin Water.pdf
- AW Districts 3-38, Attachment 14 Lobbying.pdf
- AW Districts 3-38, Attachment 15 Lobbying.pdf
- AW Districts 3-38, Attachment 16 Austin Water Membership Dues information.pdf
- AW Districts 3-38, Attachment 17 Membership Questions from Austin Water.pdf
- AW Districts 3-38, Attachment 18 Membership Questions from Austin Water.pdf
- AW Districts 3-38, Attachment 19 Lobbying.pdf
- AW Districts 3-38, Attachment 20 Membership Questions from Austin Water.pdf
- AW Districts 3-38, Attachment 21 Membership Questions from Austin Water.pdf
- AW Districts 3-38, Attachment 22 Membership Questions - Metropolitan Water District.pdf
- AW Districts 3-38, Attachment 23 Membership Questions from Austin Water.pdf
- AW Districts 3-38, Attachment 24 Lobbying.pdf
- AW Districts 3-38, Attachment 25 PUC Docket 49189 City of Austin Application to change rates.pdf
- AW Districts 3-38, Attachment 26 Lobbying.pdf
- AW Districts 3-38, Attachment 27 Water Research Foundation lobbying costs.pdf
- AW Districts 3-38, Attachment 28 Lobbying.pdf
- AW Districts 3-38, Attachment 1 Reconciliation from Schedule II-D-4 to W2 1-D-1 1c.doc
- AW Districts 3-40, Attachment 1.xlsx
- AW Districts 3-40, Attachment 2 Schedule D-3.1.c REVISED.xlsx
- AW Districts 3-42, Attachment 1 Schedule II-D-6 REVISED.xlsx
- AW Districts 3-42, Attachment 2-WWU FY 2019 Unit Object Other Table_10 19-2018.xlsx

Exhibit D

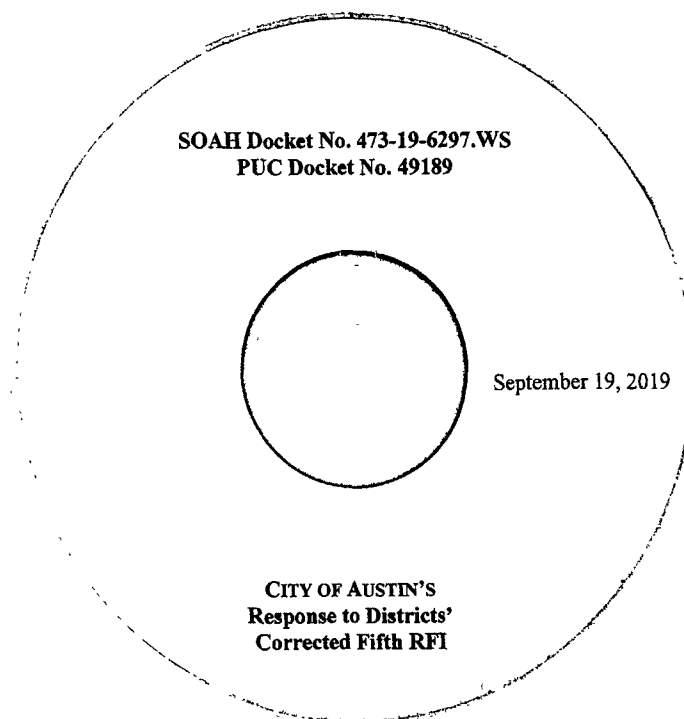
ATTACHMENTS PROVIDED ON CD



AW Districts 4-7, Attachment 1- Water Tr...	9/19/2019 3:01 PM	Water Tr... Excel W...	22 KB
AW Districts 4-8, Attachment 1- Water Di...	9/19/2019 3:01 PM	Water Di... Excel W...	25 KB

Exhibit E

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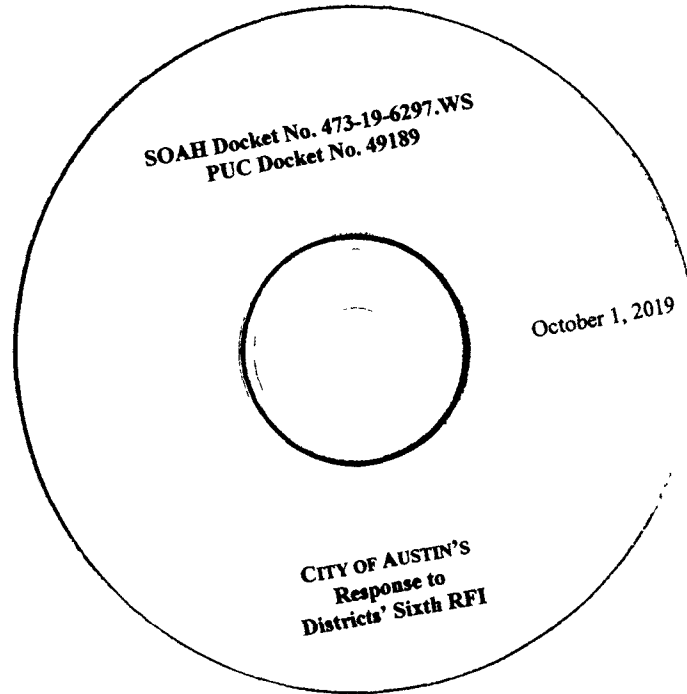


AW Districts 5-1, Attachment 1-GASB Implementation Guide.pdf

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Exhibit F

ATTACHMENTS PROVIDED ON CD



- AW Districts 6-20 Attachment 1: 201415 Final Letter Report.pdf
- AW Districts 6-20 Attachment 2: AW Central Stores Inventory Management June 2015.pdf
- AW Districts 6-20 Attachment 3: FY14 Annual Ethics Report.pdf
- AW Districts 6-20 Attachment 4: Final Audit Report 201506.pdf
- AW Districts 6-20 Attachment 5: Final Audit Report 201507.pdf
- AW Districts 6-20 Attachment 6: Final Follow-Up Report Memo 201502.pdf
- AW Districts 6-20 Attachment 7: Final Follow-Up Report Memo 201504.pdf
- AW Districts 6-20 Attachment 8: Final Follow-Up Report Memo 201507.pdf
- AW Districts 6-20 Attachment 9: Final Letter Report 201418.pdf
- AW Districts 6-20 Attachment 10: Final Letter Report Follow-up 201411.pdf
- AW Districts 6-20 Attachment 11: Final Report 2nd Follow-up 201015.pdf
- AW Districts 6-20 Attachment 12: Final Report 201010 2nd Follow-up.pdf
- AW Districts 6-20 Attachment 13: Final Report 201010 2nd Follow-up.pdf
- AW Districts 6-20 Attachment 14: Sewer Overflow Prevention and Response June 2015.pdf
- AW Districts 6-20 Attachment 15: City Customer Care April 2016.pdf
- AW Districts 6-20 Attachment 16: Water Loss Management August 2015.pdf
- AW Districts 6-20 Attachment 17: Final Letter Report 201414.pdf
- AW Districts 6-20 Attachment 18: Water Assets Not in Service List
- AW Districts 6-20 Attachment 19: Wastewater Fixed Assets Not in Service List
- AW Districts 6-20 Attachment 20: CA38 62.pdf
- AW Districts 6-20 Attachment 21: CA38 65.pdf
- AW Districts 6-20 Attachment 22: RFI 6-25 to 6-37 payroll database
- AW Districts 6-20 Attachment 23: Approved Pay and Benefit Final FY2014 to FY2018.pdf
- AW Districts 6-20 Attachment 24: Data on Vacancies at the end of FY2018 Test Year.xls
- AW Districts 6-40 Attachment 1: 2017 Sep.pdf
- AW Districts 6-40 Attachment 2: Customization
- AW Districts 6-40 Attachment 3: AW Op LC and Letter Section 2018.pdf
- AW Districts 6-40 Attachment 4: Original May.pdf
- AW Districts 6-40 Attachment 5: Final Report 2014-2015.pdf
- AW Districts 6-40 Attachment 6: Total Number of AW Employees for Each Incentive Compensation Plan
- AW Districts 6-40 Attachment 7: Financial Performance Report 2014.pdf
- AW Districts 6-40 Attachment 8: Expectations for HAZWOPREP Steward Final.pdf
- AW Districts 6-40 Attachment 9: Expectations for HAZWOPREP Steward Final.pdf
- AW Districts 6-40 Attachment 10: Signal Water Consulting - Utility Access Analysis Market Study 2018.pdf
- AW Districts 6-40 Attachment 11: Signal Water Consulting - SCA24 Market Study 2018.pdf
- AW Districts 6-40 Attachment 12: Austin Water - Engineering Consulting 2018.pdf
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