



Control Number: 49189



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

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

§  
§  
§  
§

**BEFORE THE STATE OFFICE,**  
FILING CLERK  
**OF**  
**ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S NINTH REQUEST FOR INFORMATION  
TO THE CITY OF AUSTIN DBA AUSTIN WATER  
QUESTION NOS. STAFF 9-1 THROUGH STAFF 9-22**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that the City of Austin d/b/a Austin Water, by and through its attorney of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

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Dated: October 7, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Karen S. Hubbard  
Managing Attorney

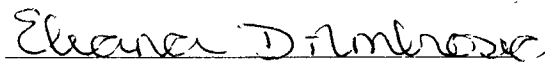


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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on October 7, 2019 in accordance with 16 Texas Administrative Code § 22.74.



Eleanor D'Ambrosio

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**COMMISSION STAFF'S NINTH REQUEST FOR INFORMATION  
TO THE CITY OF AUSTIN DBA AUSTIN WATER  
QUESTION NOS. STAFF 9-1 THROUGH STAFF 9-22**

**DEFINITIONS**

- A. "COA," "AW" or "you" refers to the City of Austin d/b/a Austin Water and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
  
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.
  
- C. "Districts" refers to North Austin Municipal Utility District No. 1, Northtown Municipal Utility District, Travis County Water Control & Improvement District No. 10, and Wells Branch Municipal Utility District.

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QUESTION NOS. STAFF 9-1 THROUGH STAFF 9-22**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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QUESTION NOS. STAFF 9-1 THROUGH STAFF 9-22**

- Staff 9-1      Please provide a transmission and distribution map for AW's water and wastewater service area. Identify each pressure plane within the service area and indicate which public water system or wastewater plant serves the identified pressure plane.
- Staff 9-2      Please provide most recent Fitch Water and Sewer Medians report.
- Staff 9-3      In how many of the last 5 years has AW needed to use its Revenue Stability Reserve Fund to cover shortfalls in revenues?
- Staff 9-4      Please identify when AW anticipates that the Revenue Stability Reserve Fund to be fully funded and explain how that conclusion was reached.
- Staff 9-5      Please provide the amount of administrative expense claimed in the test year related to SWAP.
- Staff 9-6      Please provide AW's requested total system amounts for the water reclamation system by G/L account, and indicate each amount as capital, direct O&M (see, e.g., Anders DT at 35), or reclamation system O&M. Please also provide the amounts proposed to be included in the revenue requirements used to set charges for wholesale petitioners.
- Staff 9-7      Please provide AW's requested total system amounts for the Govalle wastewater treatment plant by G/L account. Please also provide the amounts proposed to be included in the revenue requirements used to set charges for wholesale petitioners.
- Staff 9-8      Please provide by G/L account AW's Test Year costs incurred to provide revenue stability fund services to its customers.
- Staff 9-9      What would it cost AW to have its staff trained somewhere other than Govalle? Please explain and provide any supporting documentation.
- Staff 9-10     Please provide by G/L account AW's requested total system amounts for general funds transfers where some portion of the system-wide total in that account is allocated to the wholesale customer districts under AW's requested cost allocations. Please also provide the amounts proposed to be included in the revenue requirements used to set charges for wholesale petitioners.
- Staff 9-11     Please refer to AW's response to Staff 6-13. AW indicates that it has included in the wholesale revenue requirement in this case amounts associated with General

Fund administrative support, including City Clerk, Mayor & Council, Management Services, Communication & Public Information, Law, Human Resources, City Auditor, Financial Services, Building Services, Small & Minority Business, Contract Management, Office of Real Estate, and Government Relations. Please identify all the requested total system amounts by G/L account, and please also provide the amounts proposed to be included in the revenue requirements used to set charges for wholesale petitioners. How is the inclusion of these amounts consistent with AW witness Anders' representation in his direct testimony that the general fund transfer has been excluded from the requested wholesale revenue requirements? Please explain.

- Staff 9-12 Please refer to AW's response to Staff 6-13. Please provide a detailed description of what services the emergency operations center provides for AW's customers. Please identify which services of the emergency operations center are received by retail customers and which services (if any) are received by wholesale customers. Please also provide by G/L account the amounts proposed to be included in the revenue requirements used to set charges for wholesale petitioners.
- Staff 9-13 Please identify the allocation methodologies proposed by AW for the allocation of "meter shop" costs to the Districts in this case and explain how it is consistent with cost causation.
- Staff 9-14 Please refer to AW's response to Staff 6-13. Please provide a detailed description of what services the Communications Technology Management Department provides for AW's customers. Please identify which of the Department's services are received by retail customers and which services (if any) are received by wholesale customers. Please also provide by G/L account the amounts proposed to be included in the revenue requirements used to set charges for wholesale petitioners.
- Staff 9-15 Please refer to AW's response to Staff 6-13, at Liability Reserve. Please explain how the following description, provided by AW in its response, is relevant (if at all) to wholesale services to the Districts: "This requirement is AW's allocation to fund the Liability Reserve Fund which is responsible for paying claims and losses related to third party –liability for bodily injury and property damage, including contractual and professional liability." How can a wholesale customer who connects to AW on a closed loop at transmission pipe diameter 24" + suffer "bodily injury or property damage" as a result of services received from AW? Please explain. Please also provide by G/L account the amounts proposed to be included in the revenue requirements used to set charges for wholesale petitioners.
- Staff 9-16 Please refer to AW's response to Staff 6-13, at Transfer to Economic Development. Please explain. Please provide by G/L account the amounts proposed to be included in the revenue requirements used to set charges for wholesale petitioners.

- Staff 9-17 Please refer to AW's response to Staff 6-13, at Transfer to Reclaimed Water Fund. Please explain. Please provide by G/L account the amounts proposed to be included in the revenue requirements used to set charges for wholesale petitioners.
- Staff 9-18 Provide AW's original economic analysis supporting the construction of the Berl L. Handcox, Sr. treatment plant, formerly known as Water Treatment Plant No. 4.
- Staff 9-19 Provide the engineering report or study related to the construction of the Berl L. Handcox, Sr. treatment plant. Include any alternatives to constructing the Berl L. Handcox, Sr. treatment plant. that were considered.
- Staff 9-20 Describe in detail and identify and produce all documents concerning any alternatives to constructing the Berl L. Handcox, Sr. treatment plant that were considered, including the costs of those alternatives.
- Staff 9-21 Provide the results of any analyses that evaluated the construction of the Berl L. Handcox, Sr. treatment plant versus other alternatives.
- Staff 9-22 Provide the City of Austin's city council meeting minutes for any discussion related to the construction of the Berl L. Handcox, Sr. treatment plant and any documents that were provided to the city council for the discussions.