

Control Number: 49225



Item Number: 100

Addendum StartPage: 0



PETITION BY OUTSIDE CITY \$ PUBLIC UTILITY COMMISSION RATEPAYERS APPEALING THE \$ WATER RATES ESTABLISHED BY \$ OF TEXAS THE CITY OF CELINA \$

CITY OF CELINA'S RESPONSES TO OUTSIDE CITY RATEPAYERS' NINTH REQUEST FOR INFORMATION

Now comes CITY OF CELINA ("CELINA" or "City") and serves its Responses to the Outside City Ratepayers' Ninth Request for Information.

These responses are timely filed. CELINA stipulates that responses to requests for information can be treated by all parties as if the answers were filed under oath. CELINA reserves the right to amend or supplement its responses.

Respectfully submitted, **DAVIDSON TROILO REAM & GARZA, P.C.**919 Congress Avenue, Suite 810
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By: /s/ Scott Smyth
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Patrick W. Lindner
State Bar No. 12367850
plindner@dtrglaw.com

ATTORNEYS FOR CITY OF CELINA

100

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served on all parties of record on this 21st day of May, 2020, in accordance with 16 Tex. Admin. Code § 22.74.

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/s/ Scott Smyth	
Scott Smyth	

PETITION BY OUTSIDE CITY	§	
RATEPAYERS APPEALING THE	§	PUBLIC UTILITY COMMISSION
WATER RATES ESTABLISHED BY	§	
THE CITY OF CELINA	§	OF TEXAS

CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-1

RATEPAYERS' REOUEST TO CITY 9-1. Please identify and produce the documentation showing the itemization for the hours worked by Mr. Jackson and his team on a daily basis, as referenced on page 16 (Bates labeled as 0684), lines 6-7 of the Direct Testimony of Georgia N. Crump.

Response:

PCD: 269830

Invoices from Willdan, covering the time billed by Dan Jackson and his team referred to in the Direct Testimony of Georgia N. Crump are attached.

Sponsor: Dan V. Jackson

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CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-2

RATEPAYERS' REOUEST TO CITY 9-2. Please identify and produce the detailed calculations and supporting documentation for the \$25,595 in legal fees for Docket No. 48448 referenced on page 13 (Bates labeled as 0681), lines 20-22 of the Direct Testimony of Georgia N. Crump.

Response:

PCD: 269830

The City has previously provided itemized invoices for legal fees for Docket No. 48448 through February 29, 2020 and used in the Direct Testimony of Georgia N. Crump. Please refer to Attachment B of the Direct Testimony of Georgia N. Crump at Bates 0690 through 0723.

Journ Petitionners (catepayers and Collin County MUD No. 1) requested that the two
dockers be consolidated, based upon their statements that (I) the rate appeals involve
common issues of law or fact, involving the same rates and same ratemaking action
italizes by the City; (2) the ratepayers are all residents of the MUD; (3) the standard of
neview is the same and both involve the City's cost of service; (4) consolidation
would serve the interest of efficiency and prevent unwarranted expense and delay, (5)
the parties and their legal representatives are all the same people; (6) the subject
matter is identical; (7) consolidation would reduce rate case expenses for all parties;
and (\$) conseindation would avoid duplicate hearings.
The City opposed the consolidation, and the petition by the MUD was
uthinmely dismissed by the Commission on January 28, 2020. Prior to dismissal of
the petition in Docket No. 4944S, DTRG attorneys bitigated that docket in tandem
with the Rate Appeal brought by the ratepayers.
In my opinion, the facts that the same City action was the subject of both
dockets, the petitioners in both dockets had the same legal counsel, and both dockets
were proceeding simultaneously, argue for the City's recovery here of its rate case
expenses attributable to its defense of Ducket No. 49448, to the extent the expenses
can even be separately identified. I have attempted to do that in consultation with
DTRG personnel. It is my recommendation that all of the DTRG expenses be

SOAH DOCKET NO 433-20-1554WS 113 DRECT TESTMONY OF PROCEDOCHET NO 4822: GEORGIA N. CRUMP

approved for recovery. To the extent the Commission disagrees, I have identified the

amount of \$25,595 in legal fees that appear to be connected to filings and work

performed for the defense of Docket No. 48448 only.

Sponsor: Jason Gray

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CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-3

RATEPAYERS' REOUEST TO CITY 9-3. Page 9 of Appendix B to the Direct Testimony of Dan V. Jackson testimony states that, "[t]he City is no longer installing 3/4" meters for residential customers. 1" is the smallest meter the City will install." (See page 0141 of the Direct Testimony of Dan V. Jackson.) When did the City discontinue the installation of 3/4" meters?

Response:

Since 2017 the City installs 1" meters as the standard residential meter size. The City does still install 3/4" residential meters where requested.

Sponsor: Jason Gray

Rate Plan Alternative 1 - Status Quo

Table ES-7 presents a summary of the first afternative water and wastewater rate plan proposed for Residential and Commercial customers. Table ES-8 presents the impact on monthly charges of both the water and wastewater rate adjustments for representative Residential and Commercial accounts.

As previously mentioned, this alternative retains the basic rate structure for water and wastewater currently in place for the City. It requires a senes of annual percentage rate adjustments in January of each year.

in lieu of changing to a winter averaging method for billing residential sewer accounts (Allemative #1), the staff chose to "ratichet" down the 14,000 gallons monthly cap by 1,000 gallons each of the three-year rate plan. The ultimate goal is to reach 9,000 gallons, but that will require a trindrame that extends beyond the three-years of this rate plan. Since the average monthly use by residential customers never exceeded 10,000 gallons over the twelve-month test year used in the rate study, 9,000 gallons is considered an appropriate cap for the City residential customers.

fin addition, the staff decided that instead of changing 3" meter monthly charge to equal 1" meter monthly charge they will grandfather the 3" meter monthly charge. The City is no longer installing 3" meters for residential customers. It is the smallest meter the City will install.

A full exhibit of the 3-year rate plan is presented in Appendix A of this report. Appendix A further forecasts rates for a 10-year period. Hiswever, beyond FY 2021 the recommended rates should be considered as trends and general



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CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-4

RATEPAYERS' REOUEST TO CITY 9-4. Please identify the page(s) in Mr. Jackson's rate study work papers that include the "source documentation and supporting calculations for the Test Year New Accounts" referenced in the City's response to Ratepayers' Request to City 5-6. (See City's Response to Ratepayers' Fifth Request for Information at p.008.)

Response:

- 1. The City's comprehensive rate model, with the Volume Input Page that shows in precise detail how the forecast was calculated.
- 2. The City's comprehensive volume model which contains, in electronic format, several years of customer and volume data, as well as the analysis used to develop the test year and forecast accounts and consumption by customer class.
- 3. Detailed workpapers generated by Mr. Jackson and Willdan during the development of the 2018 rate study, and the 2020 Direct Testimony, provided to the ratepayers in separate and distinct folders for ease of review and comprehension. This includes the project binder which summarizes relevant workpapers developed during the study.
- 4. Hardcopy printouts of the City' source volume data contained in Mr. Jackson's workpapers, project binder, Tab 4.
- 5. The City's projections of future growth, provided by developers, City staff and the City's outside engineer contained in Mr. Jackson's workpapers, 2018 Rate Study, Project Binder, Tab
- 6. Mr. Jackson's Direct Testimony pp, 16-22 where he discussed growth factors and assumptions.
- 7. The City's comprehensive plan which presents detailed growth estimates.
- 8. Spreadsheets including the Lot Absorption Estimates provided by the City in response to Ratepayers' First Request for Information
- 9. The City's answers to Ratepayer Requests 5-6 and 5-7 in which assumptions and calculations were discussed.

Sponsor: Dan V. Jackson

PCD: 269830 Page 8 Celina's Response to Ratepayers' 9th RFIs

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CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-5

RATEPAYERS' REOUEST TO CITY 9-5. Please identify the page(s) in Mr. Jackson's rate study work papers that include the "source documentation and supporting calculations for the Forecast Annual New Water Accounts – Annual growth" amount of 22.4% referenced in the City's response to Ratepayers' Request to City 5-7. (See City's Response to Ratepayers' Fifth Request for Information at p. 009.)

Response:

- 1. The City's comprehensive rate model, with the Volume Input Page that shows in precise detail how the forecast was calculated.
- 2. The City's comprehensive volume model which contains in electronic format several years of customer and volume data, as well as the analysis used to develop the test year and forecast accounts and consumption by customer class.
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Sponsor: Dan V. Jackson

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CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-6

RATEPAYERS' REQUEST TO CITY 9-6. Please identify the page(s) in Mr. Jackson's rate study work papers that include the "source documentation and supporting calculations for the Forecast Annual New Water Accounts - Annual growth" of 22.4% inside and 0% outside referenced in the City's response to Ratepayers' Request to City 5-8. (See City's Response to Ratepayers' Fifth Request for Information at p. 010.)

Response:

- 1. The City's comprehensive rate model, with the Volume Input Page that shows in detail how the forecast was calculated.
- 2. The City's comprehensive volume model which contains in electronic format several years of customer and volume data, as well as the analysis used to develop the test year and forecast accounts and consumption by customer class.
- 3. Detailed workpapers generated by Mr. Jackson and Willdan during the development of the 2018 rate study, and the 2020 Direct Testimony, provided to the ratepayers in separate and distinct folders for ease of review and comprehension. This includes the project binder which summarizes relevant workpapers developed during the study.
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- 7. The City's comprehensive plan which presents detailed growth estimates.
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- 9. The City's answers to Ratepayer Requests 5-6 and 5-7 at which assumptions and calculations were discussed in great detail.

Sponsor: Dan V. Jackson

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CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-7

RATEPAYERS' REOUEST TO CITY 9-7. To the extent not already identified and produced, please identify and produce the Impact Fee Studies and Capital Improvements Plans prepared in accordance with Chapter 395 of the Texas Local Government Code that include any projects listed in City of Celina's Supplemental Response to Staff 3-2 at Bates pages 259 - 263.

Response:

The City's current Impact Fee Study and Capital Improvement Plans, prepared in accordance with Chapter 395 of the Texas Local Government Code, have been previously provided in response to Outside Ratepayers' Request for Information 6-1 and 6-2.

Sponsor: Jason Gray

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CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-8

RATEPAYERS' REOUEST TO CITY 9-8. For each project listed on Table DVJ-18, on page 66 of the Direct Testimony of Dan V. Jackson, please identify the following dates:

- 1. The date that construction of the original facility was completed;
- 2. The date that the original facility was placed in service:
- 3. The date that each and every improvement, upgrade, repair or replacement that is related to the original facility and included in the City's proposed rate base under either the Willdan Rate Study or the City of Celina's Supplemental Response to Staff 3-2 at Bates pages 259-263 was completed; and
- 4. The date that each and every improvement, upgrade, repair or replacement that is related to the original facility and included in the City's proposed rate base under either the Willdan Rate Study or the City of Celina's Supplemental Response to Staff 3-2 at Bates pages 259-263 became operational.

Response:

PCD: 269830

See responses to RFI 3-5 and RFI 3-6.

Sponsor: Dan V. Jackson

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CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-9

RATEPAYERS' REOUEST TO CITY 9-9. For original facility, improvement, upgrade, repair or replacement for which a date has been identified in response to Request to City 9-8, please:

- 1. Describe the original facility, improvement, upgrade, repair or replacement in detail and
- 2. Provide the actual cost of construction related to that original facility, improvement, upgrade, repair or replacement.

Response:

The City's existing water and sewer facilities, and the necessary improvements and upgrades listed in Table DVJ-18 in the Direct Testimony of Dan V. Jackson are described in detail in the City's Water and Wastewater Modeling and CIP Report, which has been previously provided in response to Outside City Ratepayers' Requests for Information 6-1 and 6-2.

Attached is the project accounting as of the end of 2018 for all projects which were then being tracked, however in many cases the cost of construction of original facilities, many of which are decades old, are generally not retained by the City.

Sponsor: Dan V. Jackson

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CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-10

RATEPAYERS' REOUEST TO CITY 9-10. For each project listed on Table DVJ-32, on page 95 of the Direct Testimony of Dan V. Jackson, please identify the following dates:

- 1. The date that construction of the original facility was completed;
- 2. The date that the original facility was placed in service:
- 3. The date that each and every improvement, upgrade, repair or replacement that is related to the original facility and included in the City's proposed rate base under either the Willdan Rate Study or the City of Celina's Supplemental Response to Staff 3-2 at Bates pages 259-263 was completed; and
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Response:

PCD: 269830

See responses to RFI 3-5 and RFI 3-6.

Sponsor: Dan V. Jackson

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CITY OF CELINA'S RESPONSES TO OUTSIDE CITY RATEPAYERS' NINTH REQUEST FOR INFORMATION

Now comes CITY OF CELINA ("CELINA" or "City") and serves its Responses to the Outside City Ratepayers' Ninth Request for Information.

These responses are timely filed. CELINA stipulates that responses to requests for information can be treated by all parties as if the answers were filed under oath. CELINA reserves the right to amend or supplement its responses.

Respectfully submitted,
DAVIDSON TROILO REAM & GARZA, P.C.
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ATTORNEYS FOR CITY OF CELINA

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served on all parties of record on this 21st day of May, 2020, in accordance with 16 Tex. Admin. Code § 22.74.

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/s/ Scott Smyth	
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CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

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Response:

PCD: 269830

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Sponsor: Dan V. Jackson

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PCD: 269830

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would serve the interest of efficiency and prevent unwarranted expense and delay, (5)
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In my opinion, the facts that the same City action was the subject of both idockets, the petitioners in both dockets had the same legal counsel, and both dockets were proceeding simultaneously, argue for the City's recovery here of its rate case expenses attributable to its defense of Docket No. 49448, to the extent the expenses can even be separately identified. If have attempted to do that in consultation with DTRG personnel. It is my recommendation that all of the DTRG expenses be approved for recovery. To the extent the Commission disagrees, I have identified the amount of \$25,595 in legal fees that appear to be connected to filings and work performed for the defense of Docket No. 48448 only.

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DESECT TESTIMONY OF

Sponsor: Jason Gray

PCD: 269830

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Response:

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Sponsor: Jason Gray

Rate Plan Alternative 1 - Status Quo

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REOUEST FOR INFORMATION RATEPAYERS' 9-4

RATEPAYERS' REOUEST TO CITY 9-4. Please identify the page(s) in Mr. Jackson's rate study work papers that include the "source documentation and supporting calculations for the Test Year New Accounts" referenced in the City's response to Ratepayers' Request to City 5-6. (See City's Response to Ratepayers' Fifth Request for Information at p.008.)

Response:

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Sponsor: Dan V. Jackson

PCD: 269830 Page 8 Celina's Response to Ratepayers' 9th RFIs

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- 3. Detailed workpapers generated by Mr. Jackson and Willdan during the development of the 2018 rate study, and the 2020 Direct Testimony, provided to the ratepayers in separate and distinct folders for ease of review and comprehension. This includes the project binder which summarizes relevant workpapers developed during the study.
- 4. Hardcopy printouts of the City' source volume data as plainly contained in Mr. Jackson's workpapers, project binder, Tab 4.
- 5. The City's projections of future growth, provided by developers, City staff and the City's outside engineer, contained in Mr. Jackson's workpapers, 2018 Rate Study, Project Binder, Tab 10.
- 6. Mr. Jackson's Direct Testimony pp, 16-22 where he discussed growth factors and assumptions extensively.
- 7. The City's comprehensive plan which presents detailed growth estimates.
- 8. Spreadsheets including the Lot Absorption Estimates provided by the City in response to Ratepayers' First Request for Information
- 9. The City's answers to Ratepayer Requests 5-6 and 5-7 at which assumptions and calculations were discussed.

Sponsor: Dan V. Jackson

PETITION BY OUTSIDE CITY	§	
RATEPAYERS APPEALING THE	§	PUBLIC UTILITY COMMISSION
WATER RATES ESTABLISHED BY	§	
THE CITY OF CELINA	§	OF TEXAS

CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-6

RATEPAYERS' REOUEST TO CITY 9-6. Please identify the page(s) in Mr. Jackson's rate study work papers that include the "source documentation and supporting calculations for the Forecast Annual New Water Accounts – Annual growth" of 22.4% inside and 0% outside referenced in the City's response to Ratepayers' Request to City 5-8. (See City's Response to Ratepayers' Fifth Request for Information at p. 010.)

Response:

- 1. The City's comprehensive rate model, with the Volume Input Page that shows in detail how the forecast was calculated.
- 2. The City's comprehensive volume model which contains in electronic format several years of customer and volume data, as well as the analysis used to develop the test year and forecast accounts and consumption by customer class.
- 3. Detailed workpapers generated by Mr. Jackson and Willdan during the development of the 2018 rate study, and the 2020 Direct Testimony, provided to the ratepayers in separate and distinct folders for ease of review and comprehension. This includes the project binder which summarizes relevant workpapers developed during the study.
- 4. Hardcopy printouts of the City' source volume data as plainly contained in Mr. Jackson's workpapers, project binder, Tab 4.
- 5. The City's projections of future growth, provided by developers, City staff and the City's outside engineer, as plainly contained in Mr. Jackson's workpapers, 2018 Rate Study, Project Binder, Tab 10.
- 6. Mr. Jackson's Direct Testimony pp, 16-22 where he discussed growth factors and assumptions extensively.
- 7. The City's comprehensive plan which presents detailed growth estimates.
- 8. Spreadsheets including the Lot Absorption Estimates provided by the City in response to Ratepayers' First Request for Information
- 9. The City's answers to Ratepayer Requests 5-6 and 5-7 at which assumptions and calculations were discussed in great detail.

Sponsor: Dan V. Jackson

PETITION BY OUTSIDE CITY	§	
RATEPAYERS APPEALING THE	§	PUBLIC UTILITY COMMISSION
WATER RATES ESTABLISHED BY	§	
THE CITY OF CELINA	§	OF TEXAS

CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-7

RATEPAYERS' REOUEST TO CITY 9-7. To the extent not already identified and produced, please identify and produce the Impact Fee Studies and Capital Improvements Plans prepared in accordance with Chapter 395 of the Texas Local Government Code that include any projects listed in City of Celina's Supplemental Response to Staff 3-2 at Bates pages 259 - 263.

Response:

The City's current Impact Fee Study and Capital Improvement Plans, prepared in accordance with Chapter 395 of the Texas Local Government Code, have been previously provided in response to Outside Ratepayers' Request for Information 6-1 and 6-2.

Sponsor: Jason Gray

PETITION BY OUTSIDE CITY	§	
RATEPAYERS APPEALING THE	§	PUBLIC UTILITY COMMISSION
WATER RATES ESTABLISHED BY	§	
THE CITY OF CELINA	§	OF TEXAS

CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-8

RATEPAYERS' REOUEST TO CITY 9-8. For each project listed on Table DVJ-18, on page 66 of the Direct Testimony of Dan V. Jackson, please identify the following dates:

- 1. The date that construction of the original facility was completed;
- 2. The date that the original facility was placed in service:
- 3. The date that each and every improvement, upgrade, repair or replacement that is related to the original facility and included in the City's proposed rate base under either the Willdan Rate Study or the City of Celina's Supplemental Response to Staff 3-2 at Bates pages 259-263 was completed; and
- 4. The date that each and every improvement, upgrade, repair or replacement that is related to the original facility and included in the City's proposed rate base under either the Willdan Rate Study or the City of Celina's Supplemental Response to Staff 3-2 at Bates pages 259-263 became operational.

Response:

PCD: 269830

See responses to RFI 3-5 and RFI 3-6.

Sponsor: Dan V. Jackson

PETITION BY OUTSIDE CITY	§	
RATEPAYERS APPEALING THE	§	PUBLIC UTILITY COMMISSION
WATER RATES ESTABLISHED BY	§	
THE CITY OF CELINA	§	OF TEXAS

CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-9

RATEPAYERS' REOUEST TO CITY 9-9. For original facility, improvement, upgrade, repair or replacement for which a date has been identified in response to Request to City 9-8, please:

- 1. Describe the original facility, improvement, upgrade, repair or replacement in detail and
- 2. Provide the actual cost of construction related to that original facility, improvement, upgrade, repair or replacement.

Response:

The City's existing water and sewer facilities, and the necessary improvements and upgrades listed in Table DVJ-18 in the Direct Testimony of Dan V. Jackson are described in detail in the City's Water and Wastewater Modeling and CIP Report, which has been previously provided in response to Outside City Ratepayers' Requests for Information 6-1 and 6-2.

Attached is the project accounting as of the end of 2018 for all projects which were then being tracked, however in many cases the cost of construction of original facilities, many of which are decades old, are generally not retained by the City.

Sponsor: Dan V. Jackson

PETITION BY OUTSIDE CITY	§	
RATEPAYERS APPEALING THE	§	PUBLIC UTILITY COMMISSION
WATER RATES ESTABLISHED BY	Š	
THE CITY OF CELINA	§	OF TEXAS

CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-10

RATEPAYERS' REOUEST TO CITY 9-10. For each project listed on Table DVJ-32, on page 95 of the Direct Testimony of Dan V. Jackson, please identify the following dates:

- 1. The date that construction of the original facility was completed;
- 2. The date that the original facility was placed in service:
- 3. The date that each and every improvement, upgrade, repair or replacement that is related to the original facility and included in the City's proposed rate base under either the Willdan Rate Study or the City of Celina's Supplemental Response to Staff 3-2 at Bates pages 259-263 was completed; and
- 4. The date that each and every improvement, upgrade, repair or replacement that is related to the original facility and included in the City's proposed rate base under either the Willdan Rate Study or the City of Celina's Supplemental Response to Staff 3-2 at Bates pages 259-263 became operational.

Response:

PCD: 269830

See responses to RFI 3-5 and RFI 3-6.

Sponsor: Dan V. Jackson

PETITION BY OUTSIDE CITY	§	
RATEPAYERS APPEALING THE	§	PUBLIC UTILITY COMMISSION
WATER RATES ESTABLISHED BY	§	
THE CITY OF CELINA	§	OF TEXAS

CITY OF CELINA'S RESPONSE TO RATEPAYERS' NINTH REQUEST FOR INFORMATION

REOUEST FOR INFORMATION RATEPAYERS' 9-11

RATEPAYERS' REOUEST TO CITY 9-11. For original facility, improvement, upgrade, repair or replacement for which a date has been identified in response to Request to City 9-8, please:

- 1. Describe the original facility, improvement, upgrade, repair or replacement in detail and
- 2. Provide the actual cost of construction related to that original facility, improvement, upgrade, repair or replacement.

Response:

PCD: 269830

This request is a duplicate of Ratepayers' Request for Information 9-9. Please refer to the City's response to Ratepayers' Request for Information 9-9.

Sponsor: Jason Gray



INVOICE

Attn: Mr. Patrick Lindner

Davidson Troilo Ream and Garza 601 NW Loop 410 Se. 800 San Antonio, TX 78216 INVOICE #:

010-41393

INVOICE DATE : PROJECT # :

5/10/2019

CUSTOMER #:

108788 C42941

TERMS:

NET 30 DAYS

Sent Via Email: plindner@dtrglaw.com

Support for Water and Wastewater Rate Appeal for the City of Celina

Professional Services through April 30, 2019

Fee Earned to Date

\$3,660.00

Prior Billings:

\$0.00

INVOICE TOTAL:

\$3,660,00

To pay via ACH:

Bank: BMO Harrsi Bank / 111 W. Monroe Street, #5C, Chicago, IL 60603

Account Name: Willdan

Routing Transit Number: 071000288 / Account #: 4398830

Remit CheckTo: Willdan Financial Services 27368 Via Industria Suite 200, Temecula, CA 92590 Questions? Call (800) 755-6864

Project Details Report

Project Manager Name: Jackson, Dan V

Level 1 Project Segment: 108788 - CELINA 2019 RATE APPEAL Customer: C42941 - DAVIDSON TROILO REAM & GA

Level 2 Project Segment: 1000 - CELINA 2019 RATE APPEAL Level 3 Project Segment: 999 - CELINA 2019 RATE APPEAL

Transaction Type	Project ID	<u>ID</u>	<u>Name</u>	Subperiod End Date	Transaction Date	Hours	Revenue Rate	Effort
Labor	108788.1000.999	101672	Tovar Coronado, Carlos A	2019-04-26	2019-04-02	3.00	100.00	300.00
Labor						3.00		300.00
Labor	Labor	005183	Jackson, Dan V	2019-03-29	2019-03-12	1.00	210.00	210.00
		005183	Jackson, Dan V		2019-03-21	2.00	210.00	420.00
	005183	Jackson, Dan V		2019-03-22	1.00	210.00	210.00	
	005183	Jackson, Dan V	2019-04-26	2019-04-02	6.00	210.00	1,260.00	
	005183	Jackson, Dan V		2019-04-03	4.00	210.00	840.00	
		005183	Jackson, Dan V		2019-04-19	2.00	210.00	420.00
Labor						16.00		3,360.00
Level 3 - 999 - Total						19.00		3,660.00
Level 2 = 1600 = Total				表		19.00	163553	3,660.00
Level 1 = 108788 = Total						19.00		3,660.00
Jackson, Dan V						19.00		3,660
Overall - Total			BEING THE RESIDENCE			19.00		3,660.00



INVOICE

Attn: Mr. Patrick Lindner

Davidson Troilo Ream and Garza 601 NW Loop 410 Se. 800 San Antonio, TX 78216 INVOICE #:

CUSTOMER #:

010-41546

INVOICE DATE : 6/5/2019 PROJECT # : 108788

108788 C42941

TERMS:

NET 30 DAYS

Sent Via Email: plindner@dtrglaw.com

Support for Water and Wastewater Rate Appeal for the City of Celina

Professional Services through May 31, 2019

Fee Earned to Date \$8,935.00

Prior Billings: (\$3,660.00)

INVOICE TOTAL: \$5,275.00

To pay via ACH:

Bank: BMO Harrsi Bank / 111 W. Monroe Street, #5C, Chicago, IL 60603

Account Name: Willdan

Routing Transit Number: 071000288 / Account #: 4398830

Remit CheckTo: Willdan Financial Services 27368 Via Industria Suite 200, Temecula, CA 92590 Questions? Call (800) 755-6864

Project Details Report

Project Manager Name: Jackson, Dan V

Level 1 Project Segment: 108788 - CELINA 2019 RATE APPEAL Customer: C42941 - DAVIDSON TROILO REAM & GA

Level 2 Project Segment: 1000 - CELINA 2019 RATE APPEAL Level 3 Project Segment: 999 - CELINA 2019 RATE APPEAL

Transaction Type	Project ID	<u>ID</u>	<u>Name</u>	Subperiod End Date	Transaction Date	Hours	Revenue Rate	Effort
Labor 108788.1000.999	101672	Tovar Coronado, Carlos A	2019-05-31	2019-05-09	4.00	100.00	400.00	
		101672	Tovar Coronado, Carlos A		2019-05-10	4.00	100.00	400.00
	101672	Tovar Coronado, Carlos A		2019-05-13	2.00	100.00	200.00	
Labor						10.00		1,000.00
Labor	or	005203	Lanning, Daniel D	2019-05-31	2019-05-13	1.50	165.00	247.50
		005203	Lanning, Daniel D		2019-05-14	1.50	165.00	247.50
Labor						3.00		495.00
Labor	005183	Jackson, Dan V	2019-05-31	2019-05-08	4.00	210.00	840.00	
	005183	Jackson, Dan V		2019-05-10	4.00	210.00	840.00	
		005183	Jackson, Dan V		2019-05-17	4.00	210.00	840.00
		005183	Jackson, Dan V		2019-05-20	2.00	210.00	420.00
		005183	Jackson, Dan V		2019-05-21	2.00	210.00	420.00
		005183	Jackson, Dan V		2019-05-24	2.00	210.00	420.00
Labor						18.00		3,780.00
Level 3 - 999 - Total		Sept.			12.10	31,00	Seek .	5,275,00
Level 2 - 1000 - Total						31.00		5,275.00
Level 1 - 108788 - Total						31,00		5,275.00
Jackson, Dan V						31.00		5,275
Overall - Total						31.00		5,275.00



INVOICE

Attn: Mr. Patrick Lindner

Davidson Troilo Ream and Garza 601 NW Loop 410 Se. 800 San Antonio, TX 78216 INVOICE #:

010-42404

INVOICE DATE : PROJECT # :

9/12/2019

CUSTOMER #:

108788 C42941

TERMS:

NET 30 DAYS

Sent Via Email: plindner@dtrglaw.com

Support for Water and Wastewater Rate Appeal for the City of Celina

Research materials related to the ongoing litigation over the City's water rates.

Fee Earned to Date \$9,214.00

Prior Billings: (\$8,935.00)

INVOICE TOTAL: \$279.00

To pay via ACH:

Bank: BMO Harrsi Bank / 111 W. Monroe Street, #5C, Chicago, IL 60603

Account Name: Willdan

Routing Transit Number: 071000288 / Account #: 4398830

Remit Check To: Willdan Financial Services 27368 Via Industria Suite 200, Temecula, CA 92590 Questions? Call (800) 755-6864