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DOCKET NO. 49225

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**PETITION BY THE OUTSIDE CITY
RATEPAYERS APPEALING THE
WATER RATES ESTABLISHED BY
THE CITY OF CELINA**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

PUBLIC UTILITY COMMISSION
FILING CLERK

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
QUESTION NOS. STAFF 3-1 THROUGH 3-16 AND COMMISSION STAFF'S THIRD
REQUEST FOR ADMISSION QUESTION NO. 3-1 TO CITY OF CELINA (CELINA)**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that City of Celina (Celina) by and through its attorneys 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 78712-3326.

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Dated: April 26, 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 April 26, 2019, in accordance with 16 TAC § 22.74.



Rashmin J. Asher

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**COMMISSION STAFF'S THRID REQUEST FOR INFORMATION
QUESTION NOS. STAFF 3-1 THROUGH 3-16 AND COMMISSION STAFF'S THIRD
REQUEST FOR ADMISSION QUESTION NO. 3-1 TO CITY OF CELINA (CELINA)**

DEFINITIONS

- A. "Celina", "Company", or "you" refers to the City of Celina and any 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.

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
QUESTION NOS. STAFF 3-1 THROUGH 3-16 AND COMMISSION STAFF'S THIRD
REQUEST FOR ADMISSION QUESTION NO. 3-1 TO CITY OF CELINA (CELINA)**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information and requests for admission 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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**COMMISSION STAFF'S THRID REQUEST FOR INFORMATION
QUESTION NOS. STAFF 3-1 THROUGH 3-16 TO CITY OF CELINA (CELINA)**

- Staff 3-1 Provide any and all rate studies, including methodologies, best practice references, and calculations, and assumptions used to support the rate changes subject to this appeal.
- Staff 3-2 Please provide any and all rate studies showing the calculations for costs allocated between the inside city and outside city customers receiving water and/or sewer service.
- Staff 3-3 Please provide any all documents showing the cost of service for water and waste water service provided by the City to inside city and outside city customers.
- Staff 3-4 Provide all documentation and information used by the City to set the rates which went into effect January 01, 2019 and March 19, 2019 subject to this appeal.
- Staff 3-5 Please provide a copy of the audited financial statements of the City completed at the time the City made its decision to institute the rates effective January 01, 2019 and March 19, 2019.
- Staff 3-6 Please provide a copy of the City's budget available at the time the City made its decision to institute the rates effective January 01, 2019 and March 19, 2019.
- Staff 3-7 For outstanding debt, please providing documents showing:
- a. Total annual interest
 - b. Principal payments
 - c. amortization schedule
 - d. allocation of debt between water and wastewater services for outside city customers and inside city customers
 - e. allocation of debt for capital investment issued for water and wastewater services for outside city customers for years 2018-2019.
- Staff 3-8 Provide copies of all debt agreements including but not limited to bond agreements and loan agreements for any debt service used to provide water and wastewater service.
- Staff 3-9 Please explain in detail what entity installed and paid for the infrastructure to provide water and wastewater service to the out of city customers and provide all agreements made with any entities that shared in payment for such infrastructure.

- Staff 3-10 Please provide the source(s) and amounts of funding used to install infrastructure used by the City to provide water and sewer service to the outside city customers.
- Staff 3-11 Please provide total gallons of water produced and gallons of water billed for the fiscal year completed directly prior to the date the decision was made to increase the rates subject to this appeal by month, customer class, and tier. Please provide separately and in total for inside and outside city customers.
- Staff 3-12 Please provide the total gallons of water produced and total gallons of water billed for the fiscal year prior to November 18, 2019 for:
- a. Inside city customers
 - b. outside city customers
- Staff 3-13 Please provide the revenue requirement including detailed expenses used to set the rates and supporting financial statements or budget used to determine the revenue requirement.
- Staff 3-14 Please provide the general ledger which includes detailed expenses used to determine the revenue requirement. Please also provide supporting financial statements used to determine the revenue requirement.
- Staff 3-15 Please provide any explanation between the historical financial statements and/or the budget used and the revenue requirement used to set the rates subject to this appeal.
- Staff 3-16 Provide a copy of the notice sent to each effected individual customer and a signed and a copy of the affidavit indicating when notice was provided.

**COMMISSION STAFF'S THIRD REQUEST FOR ADMISSION TO CELINA
QUESTION NO. STAFF 3-1**

- Staff 3-1** Admit or deny that Collin County No. #1 Municipal Utility District installed and funded the infrastructure in place to serve the outside city customers.