



Control Number: 49225



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DOCKET NO. 49225

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

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PUBLIC UTILITY COMMISSION
OF TEXAS

**CITY OF CELINA'S RESPONSES TO COMMISSION STAFF'S
REQUEST FOR INFORMATION 4-1 THROUGH 4-6**

Now comes CITY OF CELINA ("CELINA") and serves its Responses to the Commission Staff's Fourth Request for Information.

These responses are timely filed consistent with the agreement between Staff and CELINA. 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,

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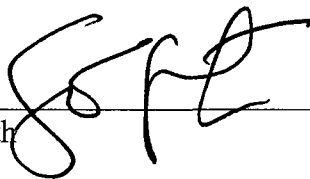
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served on all parties of record on this 30th day of July, 2019, in accordance with 16 Tex. Admin. Code § 22.74.

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A handwritten signature in black ink, appearing to read 'Smyth', is written over a horizontal line.

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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 COMMISSION STAFF'S
FOURTH REQUEST FOR INFORMATION NOS. 4-1 THROUGH 4-6**

REQUEST FOR INFORMATION STAFF 4-1:

Staff 4-1. Provide an electronic Microsoft Excel spreadsheet of the amounts in City of Celina's Response to Staff 3-2 bates pages 339, 340, 341, and 342, including the amounts and formulas within each cell to calculate each of the amounts.

RESPONSE:

The requested spreadsheet is not in the possession, custody, or control of the City of Celina. The City has not contracted with its consultant to obtain the spreadsheet in any format other than PDF.

If and when the City is given an opportunity to provide its direct testimony in this case, the City would consider entering into an agreement with the consultant to obtain access to such highly sensitive confidential spreadsheets.

Sponsor: Jason Laumer, City Manager

REQUEST FOR INFORMATION STAFF 4-2:

Staff 4-2. Reference City of Celina's Response to Staff 3-2, bates page 22. Provide an updated electronic Microsoft Excel spreadsheet that contains the wastewater data that matches the wastewater rates approved per City of Celina, Texas Ordinance 2019-08.

RESPONSE:

The requested spreadsheet is not in the possession, custody, or control of the City of Celina. The City has not contracted with its consultant to obtain the spreadsheet in any format other than PDF.

If and when the City is given an opportunity to provide its direct testimony in this case, the City would consider entering into an agreement with the consultant to obtain access to such highly sensitive confidential spreadsheets.

Sponsor: Jason Laumer, City Manager

REQUEST FOR INFORMATION STAFF 4-3:

Staff 4-3. Provide an electronic copy of each Microsoft Excel spreadsheet file in the 2018 Water and Wastewater Rate Study and Financial Forecasts.

RESPONSE:

The requested spreadsheet is not in the possession, custody, or control of the City of Celina. The City has not contracted with its consultant to obtain the spreadsheet in any format other than PDF.

If and when the City is given an opportunity to provide its direct testimony in this case, the City would consider entering into an agreement with the consultant to obtain access to such highly sensitive confidential spreadsheets.

Sponsor: Jason Laumer, City Manager

REQUEST FOR INFORMATION 4-4:

Staff 4-4. Reference the City of Celina's response to Staff RFI 3, and the application, bates pages 340-342. Cross reference each amount provided on bates pages 340, 341, and 342 to the City of Celina's city's financial records or any other supplemental information provided.

RESPONSE:

This would require the City to create documents that do not exist. This would further require an expert to derive such information.

If and when the City is given an opportunity to provide its direct testimony in this case, the City would plan to engage an expert to potentially generate such information as part of their testimony.

Sponsor: Jason Laumer, City Manager

REQUEST FOR INFORMATION 4-5:

Staff 4-5. Provide a list of debt instruments the City of Celina had issued and are currently outstanding that were used to provide water and sewer service at the time ordinance No. 2019-8 was approved. For each debt instrument listed, indicate the amount that is attributable to providing water and sewer service to Collin County MUD #1, including the bates page reference # of the amortization schedule.

RESPONSE:

Regarding the request in the first sentence, see response to Staff 3-7 (Bates Stamp pages 1828 – 1854, entitled “Aggregate Debt Service”). The debt instruments listed in there are current as of the time that ordinance No. 2019-8 was adopted.

Regarding the second sentence, this would require the City to create documents that do not exist. This would further require an expert to derive such information.

If and when the City is given an opportunity to provide its direct testimony in this case, the City would plan to engage an expert to potentially generate such information as part of their testimony.

Sponsor: Jason Laumer, City Manager

REQUEST FOR INFORMATION 4-6:

Staff 4-6. For each of the City of Celina's outstanding debt, please provide the amount of impact fees that have been collected, as well as will be collected, pursuant to the terms of the Development Agreement provided in response to Staff RFI 3-9 or any other agreement by the City and Collin County MUD #1.

RESPONSE:

The City of Celina pays \$2,800 per building permit in impact fees within the Doe Branch basin to MUD #1 as part of an economic development grant to reimburse the MUD's costs of paying for the water/sewer infrastructure up front. These payments are grants to the MUD, and are in addition to debt the City has sold to construct infrastructure. The total agreed upon payment from impact fees totals \$9,230,000, of which \$317,600 remains to be paid.

Sponsor: Jason Laumer, City Manager