

Control Number: 49225



Item Number: 32

Addendum StartPage: 0

DOCKET NO. 49225

§ §

§ § 二行 三门 三门

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

PUBLIC UTILITY COMMISSION

<u>CITY OF CELINA'S RESPONSES TO COMMISSION STAFF'S</u> <u>REQUEST FOR INFORMATION 5-1 THROUGH 5-3</u>

Now comes CITY OF CELINA ("CELINA") and serves its Responses to the Commission Staff's Fifth 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 Austin, Texas 78701 Telephone: (512) 469-6006 Facsimile: (512) 473-2159 By: Scott Smyth State Bar No. 18779450 <u>ssmyth@dtrglaw.com</u> Patrick W. Lindner State Bar No. 12367850 plindner@dtrglaw.com

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 23rd day of September, 2019, in accordance with 16 Tex. Admin. Code § 22.74.

Rashmin J. Asher Staff Attorney Public Utility Commission of Texas 1701 N. Congress Ave. Austin, TX 78711 Rashmin.asher@puc.texas.gov

Randall B. Wilburn Helen S. Gilbert Gilbert Wilburn, PLLC 7000 N. MoPac Expressway, Suite 200 Austin, TX 78731 <u>rbw@gwtxlaw.com</u> <u>hgilbert@gwtxlaw.com</u>

Scott Smyth

DOCKET NO. 49225

§ §

§ §

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

PUBLIC UTILITY COMMISSION

OF TEXAS

<u>CITY OF CELINA'S RESPONSE TO COMMISSION STAFF'S</u> FIFTH REQUEST FOR INFORMATION NOS. 5-1 THROUGH 5-3

REQUEST FOR INFORMATION STAFF 5-1:

Staff 5-1. Please provide any and all rate studies in Microsoft Excel format showing the calculations for costs allocated between the inside city and outside city customers receiving water and/or sewer services.

RESPONSE:

The requested spreadsheets are not in the possession, custody, or control of the City of Celina. The City has not contracted with its consultant to obtain such spreadsheets 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 plan to enter into an agreement with the consultant to obtain access to such highly sensitive confidential spreadsheets.

Sponsor: Jason Laumer, City Manager

REQUEST FOR INFORMATION STAFF 5-2:

Staff 5-2. Please provide electronic Microsoft Excel spreadsheets showing the calculations for the 2018 Water and Wastewater Rate Study provided in Response to Staff's Request for Information 3-2.

RESPONSE:

The requested spreadsheets are not in the possession, custody, or control of the City of Celina. The City has not contracted with its consultant to obtain such spreadsheets 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 plan to enter 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 5-3. Please provide electronic Microsoft Excel spreadsheets showing the calculations for the Comprehensive Financial Annual Report for Fiscal Year ending in September 30, 2017 provided in Response to Staff Request for Information 3-5.

RESPONSE:

The requested spreadsheets are not in the possession, custody, or control of the City of Celina. The City has not contracted with its consultant to obtain such spreadsheets 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 plan to enter into an agreement with the consultant to obtain access to such highly sensitive confidential spreadsheets.

Sponsor: Jason Laumer, City Manager