

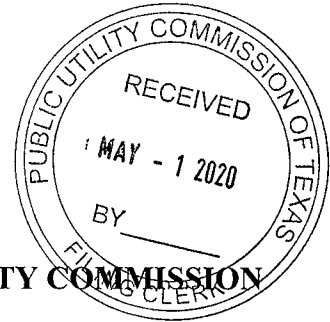
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SOAH DOCKET NO. 473-20-1554.WS  
DOCKET NO. 49225



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

PUBLIC UTILITY COMMISSION  
OF TEXAS

**CITY OF CELINA’S SUPPLEMENTAL RESPONSES TO OUTSIDE CITY  
RATEPAYERS’ THIRD REQUEST FOR INFORMATION 3-1 AND 3-6**

Now comes CITY OF CELINA (“CELINA” or “City”) and serves its Supplemental Responses to the Outside City Ratepayers’ Third Request for Information 3-1 and 3-6.

This supplemental response is timely filed pursuant to 16 Tex. Admin. Code § 22.144 (i). 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 its response.

Respectfully submitted,

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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 1<sup>st</sup> day of May, 2020, in accordance with 16 Tex. Admin. Code § 22.74.

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\_\_\_\_\_  
/s/ Scott Smyth  
Scott Smyth

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<b>WATER RATES ESTABLISHED BY</b>	<b>§</b>	
<b>THE CITY OF CELINA</b>	<b>§</b>	<b>OF TEXAS</b>

**CITY OF CELINA’S SUPPLEMENTAL RESPONSE TO  
OUTSIDE CITY RATEPAYER’S THIRD REQUEST FOR INFORMATION NO. 3-1**

**REQUEST FOR INFORMATION RATEPAYERS’ 3-1:**

- Ratepayers’ 3-1.** Relating to the water capital projects shown on Table DVJ-18, on page 66 of the Direct Testimony of Dan V. Jackson, please identify and provide the following documentation, including all engineering studies, that provide the following information:
- a. Detailed description of each project, b. Detailed support for the cost of each project, and c. Detail of the derivation of the timing and amount of the annual capital expenditures related to each project.

**SUPPLEMENTAL RESPONSE:** The capital improvement projects shown on Table DVJ-18 on page 66 of the Direct Testimony of Dan V. Jackson are drawn from the City of Celina’s Water and Wastewater Modeling and CIP Report dated September 2017 and prepared by Garver Engineering (located in Frisco, Texas). The capital projects shown on Table DVJ-18 are the operationalization of the recommendations in the CIP Report. The report, which has been previously provided, includes a detailed description of the projects, the engineer’s opinion of probable costs of each project, and information regarding the derivation of the timing and amounts of the capital expenditures related to each project.

Sponsor: Jason Gray

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**CITY OF CELINA’S SUPPLEMENTAL RESPONSE TO  
OUTSIDE CITY RATEPAYER’S THIRD REQUEST FOR INFORMATION NO. 3-6**

**REQUEST FOR INFORMATION RATEPAYERS’ 3-6:**

**Ratepayers’ 3-6.** Please identify the date that each project listed on Table DVJ-32, on page 95 of the Direct Testimony of Dan V. Jackson, was placed in service.

**SUPPLEMENTAL RESPONSE:** Several of the projects listed in Table DVJ-32 on page 95 of the Direct Testimony of Dan V. Jackson are expansion, reconstruction, rehabilitation, or replacement projects which have been in service for many years, and often decades. For instance, the Downtown WWTP Upgrade is a capacity expansion to the Downtown Waste Water Treatment Plant, which has been in service since for decades. The Downtown WWTP was never taken off-line during this capacity expansion, and so it has remained continually in service. An upgrade is not placed in service.

Sponsor: Jason Gray