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APPLICATION OF TIMBERCREST	§	BEFORE THE STATE OFFICE
PARTNERS LLC FOR AUTHORITY	§	\mathbf{OF}
TO CHANGE RATES	§	ADMINISTRATIVE HEARINGS

TIMBERCREST PARTNERS LLC'S RESPONSE TO COMMISSION STAFF'S TENTH REQUEST FOR INFORMATION

TO: Public Utility Commission of Texas, by and through their attorneys of record, Kevin Bartz, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

COMES NOW, Timbercrest Partners, LLC ("TCP"), by and through their attorneys of record, and files these responses to The Public Utility Commission of Texas' Tenth Requests for Information. TCP stipulates that these responses may be treated as if filed under oath.

Respectfully submitted,

Shea & Associates, PLLC

By: /s/ Tammy Shea
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ATTORNEYS FOR TIMBERCRESTPARTNERS, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document will be served on all parties of record on
October 20, 2022 in accordance with 16 TAC § 22.74 and the Commission's rules requiring
electronic service.

/s/ Tammy Shea
Tammy Shea

RESPONSES TO TENTH RFIS

Staff 10-1

Please refer to Table 4 on page 10 of Mr. Loy's testimony. The sewer proposed rate base includes land of \$43,368. However, the application (WP-Cust Class Cost of Ser Study, page 10) includes land of \$207,851. Please explain the reason Mr. Loy's testimony was not updated for return on invested capital based on the updated land amount.

Response:

The land amount assigned to sewer has not been updated. Table 4 on page 10 of Mr. Loy's testimony is erroneously referencing the cash working capital amount assigned to sewer rather than the correct land value. Table 4 Updated presented below correctly reflects the as filed land value assigned to sewer.

TABLE 4 UPDATED Proposed Rate Base

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	WATER	SEWER	Total	
Distribution - Gross Accumulated Depreciation	\$410,477 (\$241,157)	\$513,296 (\$238,237)	\$923,773 (\$479,394)	
Treatment Plant - Gross	\$508,797	\$286,913	\$795,710	
Accumulated Depreciation Land	(\$192,530) \$250,078	(\$181,223) \$207,851	(\$373,753) \$457,929	
Cash Working Capital	\$10,441	\$43,368	\$53,809	
Total Rate Base	\$746,107	\$631,967	\$1,378,075	

Prepared by: Chuck Loy Sponsored by: Chuck Loy