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SOAH DOCKET NO. 473-21-0477.WS
PUC DOCKET NO. 50557

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APPLICATION OF CORIX UTILITIES
(TEXAS), INC. FOR AUTHORITY TO
CHANGE RATES

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§
§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

PUBLIC UTILITY COMMISSION
FILING CLERK

COMMISSION STAFF'S AMENDED EIGHTH REQUEST FOR INFORMATION
TO CORIX UTILITIES (TEXAS), INC.
QUESTION NOS. STAFF 8-1 THROUGH 8-7

On December 31, 2020, the Staff of the Public Utility Commission of Texas (Staff) filed its Seventh Request for Information to Corix Utilities (Texas), Inc. Staff now withdraws those requests and replaces them with this Amended Eighth Request for Information to Corix Utilities (Texas), Inc.

Pursuant to 16 Texas Administrative Code § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that Corix Utilities (Texas), Inc. (Corix), by and through its attorneys of record, provide the following information and answer the following questions under oath. The questions 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 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. 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 responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: December 31, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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/s/ Creighton R. McMurray
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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on December 31, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Creighton R. McMurray
Creighton R. McMurray

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**COMMISSION STAFF'S AMENDED EIGHTH REQUEST FOR INFORMATION
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DEFINITIONS

- A. "Corix," the "Company," or "you" refers to Corix Utilities (Texas), Inc., and any person acting or purporting to act on its 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 partial documents which do exist and these documents will be provided.

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QUESTION NOS. STAFF 8-1 THROUGH 8-7**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information 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(g)(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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- Staff 8-1 For each water and sewer rate region proposed by Corix that contains more than one water or sewer system, please describe how the water or sewer systems included in the rate region are substantially similar in facilities, quality of service, and cost of service, and how the proposed consolidated rates for that region promote water conservation for single-family residences and landscape irrigation.
- Staff 8-2 Please provide copies of invoices for purchased water included in the cost of service for the following rate region:
- a. Hill Country Water \$189,887
 - b. Southeast Water \$40,089
- Staff 8-3 Please refer to the direct testimony of Ms. Mary Blinco,¹ “Lometa Raw Water Lease.” Please provide the following information:
- a. Amount of annual lease payment;
 - b. Amount of lease payment included in this rate change application;
and
 - c. The account used to record the lease payment.
- Staff 8-4 Please refer to the currently approved interim tariff for Corix. Please admit or deny that Corix has an approved “Purchased Water and/or District Fee Pass Through Clause.” If admit, please identify the water systems and the rate regions whose tariff include the Purchased Water and/or District Fee Pass Through Clause.
- Staff 8-5 Please refer to Question No. Staff 8-4. Please provide the total amount collected for the Purchased Water and/or District Fee Pass Through Clause for the test year and the year after the test year (known and measurable changes).
- Staff 8-6 If water pass-through fees are not collected from the corresponding customers, please explain how Corix recoups the costs for the purchased water and district fees.
- Staff 8-7 Please provide a list of expenses incurred that are included in this rate application related to any sale, transfer, or merger and certificate of convenience and necessity transactions of Corix, with the following information:
- a. Date;

¹ Direct Testimony of Mary Blinco, p. 20 of 22, Bates 296 (Mar. 16, 2020).

- b. Payee;**
- c. Amount;**
- d. Docket or application number; and**
- e. Name of utility purchased.**