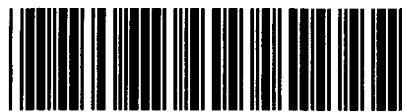




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SOAH DOCKET NO. 473-20-4071.WS
PUC DOCKET NO. 50788

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RATEPAYERS APPEAL OF THE	§	BEFORE THE STATE OFFICE
DECISION BY WINDERMERE	§	OF
OAKS WATER SUPPLY	§	ADMINISTRATIVE HEARINGS
CORPORATION TO CHANGE	§	
WATER AND SEWER RATES	§	

**COMMISSION STAFF’S FOURTH REQUEST FOR INFORMATION
TO WINDERMERE OAKS WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 4-1 THROUGH 4-8**

The Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Windermere Oaks Water Supply Corporation (Windermere) 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, Windermere must submit an amended answer, under oath, as a supplement to its 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 that 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: April 20, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Eleanor D'Ambrosio
Managing Attorney

/s/ Merritt Lander
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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 on April 20, 2021 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Merritt Lander
Merritt Lander

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO WINDERMERE OAKS WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 4-1 THROUGH 4-8**

DEFINITIONS

- 1) "Windermere" or "you" refers to Windermere Oaks Water Supply Corporation and any person acting or purporting to act on its behalf, including, without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO WINDERMERE OAKS WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 4-1 THROUGH 4-8**

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(h)(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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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO WINDERMERE OAKS WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 4-1 THROUGH 4-8**

- Staff 4-1** Please refer to Attachment MN-2 of the Direct Testimony of Mike Nelson. Please provide an electronic copy (.xlsx) of this attachment. The electronic file should include all of the formulas used to calculate the rates. Please ensure that no cell, or any portion of the electronic file is locked for editing.
- Staff 4-2** Please refer to Attachment MN-1 (Page 3 of 3) of the Direct Testimony of Mike Nelson. For the additional gallonage charges listed under the “Monthly Base Rate and Usage Charges”, please provide an electronic file (.xlsx) demonstrating the calculated tiered charges, along with all of the supporting data used to calculate the tiered charges.
- Staff 4-3** Please refer to Attachment MN-1 (Page 3 of 3) of the Direct Testimony of Mike Nelson. For the Wastewater (Sewer) Service charge of \$66.41, please provide an electronic file (.xlsx) demonstrating the calculated sewer charge, along with all of the supporting data used to calculate the sewer charge.
- Staff 4-4** Please refer to Attachment MN-1 (Page 3 of 3) of the Direct Testimony of Mike Nelson. For the Wastewater (Sewer) Service gallonage charge of \$3.94 per 1,000 gallons of water consumed, please provide an electronic file (.xlsx) demonstrating the calculated sewer gallonage charge, along with all of the supporting data used to calculate the sewer gallonage charge.
- Staff 4-5** Please refer to Attachment MN-1 (Page 3 of 3) of the Direct Testimony of Mike Nelson. For the Water Service charge of \$90.39, please provide an electronic file (.xlsx) demonstrating the calculated water charge, along with all of the supporting data used to calculate the water charge.
- Staff 4-6** For the test year used to calculate the protested water rates for Windermere, please provide the total gallonage sold during the test year along with a breakdown of the gallonage sold for each tier.
- Staff 4-7** For the test year used to calculate the protested sewage rates for Windermere, please provide the total gallonage used for the test year.
- Staff 4-8** For the test year used to calculate the protested sewage rates for Windermere, please provide the total number of meters used for the test year.