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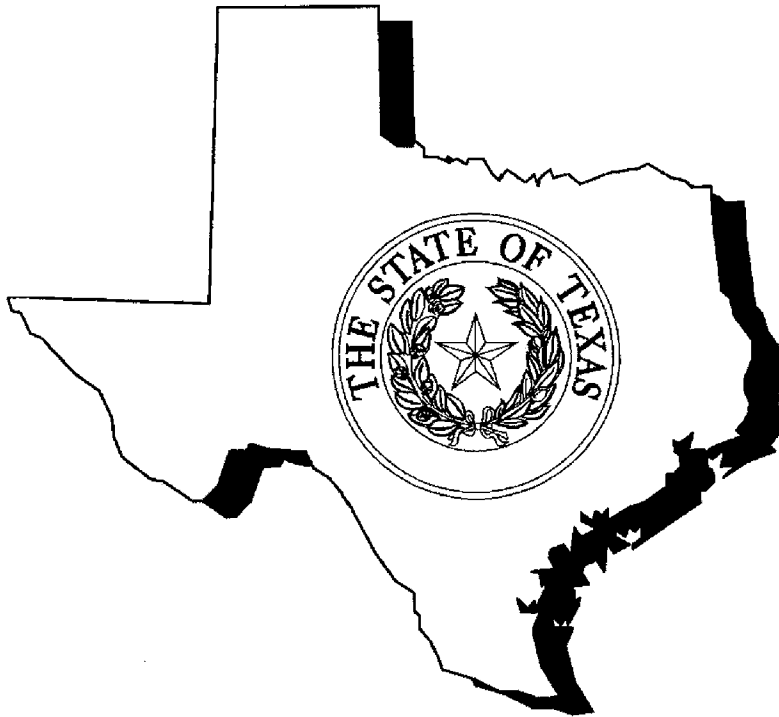
**RATEPAYERS APPEAL OF THE
DECISION BY WINDERMERE OAKS
WATER SUPPLY CORPORATION TO
CHANGE WATER AND SEWER
RATES**

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**BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS**



**SUPPLEMENTAL DIRECT TESTIMONY OF

STEPHEN J. MENDOZA

RATE REGULATION DIVISION

PUBLIC UTILITY COMMISSION OF TEXAS

JANUARY 10, 2023**

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I. STATEMENT OF QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Stephen Mendoza. My business address is 1701 N. Congress Avenue
Austin, Texas 78711-3326.

Q. By whom are you employed and in what position?

A. I am employed by the Public Utility Commission of Texas (Commission) as a Senior
Rate Analyst in the Tariff and Rate Analysis Section of the Rate Regulation Division.

**Q. What are your principal responsibilities as a Senior Rate Analyst for the
Commission?**

A. My principal area of responsibility is performing analyses of utility cost allocation, rate
design, and tariff filings. My responsibilities include analyzing cost allocation studies
and rate design issues for regulated utilities, reviewing tariffs of regulated utilities to
determine compliance with Commission requirements, and preparing and providing
testimony as an expert witness on rate-related issues in docketed proceedings before the
Commission and the State Office of Administrative Hearings (SOAH).

Q. Please describe your professional and educational background.

A. I received a BA in Economics from the University of Texas at Austin in 1996. I have
been employed for 26 years in positions of increasing responsibility with the Public
Utility Commission of Texas dealing with utility regulatory issues in the
telecommunications, electric, and water industry. I have provided a summary of my
educational background and regulatory experience in Attachment SJM-1.

Q. Have you previously filed testimony before the Commission or SOAH?

A. Yes. I have provided a summary of my filed testimony in Attachment SJM-1.

II. PURPOSE AND SCOPE OF TESTIMONY

Q. What is the purpose of your testimony?

A. My supplemental testimony will address cost allocation and rate design issues for water and wastewater service provided to the ratepayers of Windermere Oaks Water Service Corporation (WOWSC). Specifically, my testimony will address the rate design of base rates (minimum charges) and volumetric rates for both water and wastewater.

III. SUMMARY OF RECOMMENDATIONS

Q. Please summarize your recommendations.

A. I recommend the following:

- The Commission order WOWSC to charge a new monthly base water rate (minimum charge) of \$40.43.
- The Commission order WOWSC to charge a new monthly base wastewater rate (minimum charge) of \$29.81.
- The Commission Order WOWSC to charge new tiered volumetric rates for water service as follows:
 - 0-2,000 gallons: \$3.90 per 1,000 gallons
 - 2,001-4,000 gallons: \$4.93 per 1,000 gallons
 - 4,001-8,000 gallons: \$6.92 per 1,000 gallons
 - 8,001-15,000 gallons: \$9.68 per 1,000 gallons
 - 15,001 or more gallons: \$13.30 per 1,000 gallons
- The Commission Order WOWSC to charge a new volumetric rate of \$6.55 per 1,000 gallons for wastewater service.

Q. What material did you use to prepare your testimony.

A. In preparing my testimony, I reviewed the rate appeal and supplements submitted by the Ratepayers, WOWSC's response to the appeal, the direct and supplemental testimony of

the Ratepayers' and WOWSC's witnesses, certain discovery responses, testimony filed by other Staff witnesses in this proceeding, and any applicable statutes and rules.

IV. WINDERMERE'S CURRENT RATES

Q. Briefly describe the retail water and wastewater rates that are the subject of this appeal.

A. WOWSC increased the retail water base rate (minimum charge) and wastewater base rate (minimum charge) for its residential customers with an effective date of March 23, 2020. The rates for residential customers were increased as follows:¹

- The retail water base rate (minimum charge) was increased from \$50.95 per month to \$90.39 per month, and
- The retail wastewater base rate (minimum charge) was increased from \$40.12 per month to \$66.41 per month.

Q. How did WOWSC arrive at the decision to increase the base water and wastewater rates (minimum charges) that were implemented on March 23, 2020?

A. As stated in the direct testimony of WOWSC witness Mike Nelson, WOWSC's decision to increase rates was based on the result of a rate analysis conducted by the Texas Rural Water Association (TRWA).² The rate analysis was requested by WOWSC after it incurred legal expenses totaling \$107,287.99 in 2019.³

Q. What were the resulting rates from the requested TRWA rate analysis?

¹ Direct Testimony of Mike Nelson, Attachment MN-1 at 2-3 (Mar. 10, 2021).

² *Id.* at Attachment MN-2.

³ *Id.* at 6.

1 A. According to Mr. Nelson, the “TRWA rate analysis used Windermere’s 2019 year-end
2 financials and determined a base water rate (minimum charge) of \$116.68 per month
3 using 253 customers.”⁴ Mr. Nelson stated that the analysis should have used 271
4 customers instead of 253 customers. Additionally, TWRA’s rate analysis used the cash
5 needs methodology to calculate the revenue requirement used to set rates.⁵ To my
6 knowledge, the TRWA rate analysis did not identify a wastewater base rate (minimum
7 charge).

8 **Q. Do you agree with the March 23, 2020 rates implemented by WOWSC as a result**
9 **of the TRWA rate analysis?**

10 A. No. First, the resulting water base rate (minimum charge) of \$116.68 per month appears
11 to reflect a customer count of 253 instead of the correct customer count of 271. Secondly,
12 this monthly water base rate (minimum charge) of \$116.68 is not in agreement with
13 WOWSC’s current water base rate (minimum charge) of \$90.39 per month as is reflected
14 in WOWSC’s current Fee Schedule Summary.⁶ Further, while WOWSC has stated that
15 the TRWA rate analysis includes a single revenue requirement for both water and
16 wastewater,⁷ WOWSC has not made it clear if the resulting base rate (minimum charge)
17 of \$116.68 is for water only. Lastly, the TRWA rate analysis does not appear to calculate
18 a corresponding monthly wastewater base rate (minimum charge), while WOWSC’s

⁴ *Id.* at 7.

⁵ *Id.* at 8.

⁶ *Id.* at Attachment MN-1 at 3.

⁷ Windermere Oaks Water Supply Corporation’s Response to Commission Staff’s First Request for Information at 14 (Nov. 9, 2020).

current Fee Schedule Summary reflects a wastewater base rate (minimum charge) of \$66.41 per month.

Q. Do you have any additional issues with the TRWA rate analysis?

A. Yes. Ideally, the TRWA rate analysis should have included a separate revenue requirement for water and wastewater. This would allow for a more definite rate calculation to determine the monthly base water and wastewater rates. If the TRWA rate analysis is only to include a single revenue requirement, the analysis should succinctly identify how costs are allocated between water and wastewater to determine the total amount of revenues to be recovered by water rates and the total amount to be recovered by wastewater rates. Based upon my review of the TRWA rate analysis, there is not clear and concise evidence demonstrating that costs were allocated between water and wastewater functions. The only allocation demonstrated in the TRWA rate analysis is the allocation between fixed costs (costs that generally remain constant regardless of how much water is produced and sold) and variable costs (costs that fluctuate with the amount of water produced and sold). Further, the TRWA rate analysis provided by Mr. Nelson is titled “Water Revenue Requirement & Rate Design.”⁸ Ultimately, it is not clear if a wastewater base rate (minimum charge) has been calculated as a result of the TRWA rate analysis.

Q. Did WOWSC provide clarification on the revenue requirement allocation between water and wastewater for the TRWA rate analysis?

⁸ Nelson Direct at Attachment MN-2.

1 A. Yes. In response to Staff 1-16, WOWSC stated that approximately 60% of its service
2 revenue is for water while approximately 40% of its service revenue is for wastewater.⁹

3 **Q. Has WOWSC made it clear that the revenue requirement of \$576,192 identified in**
4 **the TRWA rate analysis includes costs associated with water and wastewater**
5 **volumetric service?**

6 A. Yes. In response to Staff 5-8, WOWSC affirmed that costs associated with both water
7 and wastewater volumetric service are included in the TRWA rate analysis.¹⁰

8 **Q. Did WOWSC implement new volumetric water and wastewater service rates in**
9 **response to the TRWA rate analysis?**

10 A. No. It is my understanding that WOWSC only implemented new monthly base rates
11 (minimum charge) for water (\$90.39/month) and wastewater (\$66.41/month) as a result
12 of the TRWA rate analysis. As I previously mentioned in my testimony, these new
13 monthly base rates (minimum charge) for water and wastewater are not identified
14 anywhere in the TRWA rate analysis.

15 **Q. If the TRWA rate analysis includes costs associated with water and wastewater**
16 **volumetric service, is it appropriate that WOWSC only proposed new base rates**
17 **(minimum charge) for water and wastewater with no newly proposed rates for**
18 **volumetric water and wastewater service?**

19 A. I don't believe so. Given that the TRWA rate analysis involves a revenue requirement
20 that includes system-wide costs associated with providing water and wastewater service,

⁹ Windermere Oaks Water Supply Corporation's Response to Commission Staff's First Request for Information at 18 (Nov. 9, 2020).

¹⁰ Windermere Oaks Water Supply Corporation's Response to Commission Staff's Fifth Request for Information at 10 (Nov. 8, 2022).

1 then I believe that it is reasonable to presume that the revenue requirement for the test
2 year in the TRWA rate analysis should result in new monthly base rates (minimum
3 charge) for water and wastewater, along with new volumetric rates for water and
4 wastewater service. If only new monthly base rates (minimum charge) are implemented
5 for water and wastewater, then you are left with a scenario where the unchanged
6 volumetric water and wastewater rates are recovering a different revenue requirement
7 than what was established under the TRWA rate analysis. This appears to be what is
8 happening under WOWSC's current proposed rates.

9
10 **V. RATE DESIGN**

11 **Q. Has Staff recommended a water revenue requirement for WOWSC?**

12 A. Yes. Staff witness Anna Givens has recommended a water revenue requirement in the
13 amount of \$213,826 for WOWSC.¹¹ Please see Ms. Givens' supplemental testimony for
14 an explanation of how she arrived at the water revenue requirement for WOWSC.

15 **Q. Have you calculated a new monthly water base rate (minimum charge) using Staff's**
16 **water revenue requirement?**

17 A. Yes.

18 **Q. What is the just and reasonable monthly water base rate (minimum charge) for**
19 **water service for WOWSC?**

20 A. Please refer to Attachment SJM-3 for the calculation of Staff's monthly water base rate
21 (minimum charge) of \$40.43 for WOWSC. This calculated rate is based on the revenue

¹¹ Supplemental Direct Testimony of Anna Givens at 6 (January 10, 2023) (Givens Supplemental Direct).

1 requirement recommended by Ms. Givens¹² and is sufficient, equitable, and consistent
2 in application to each customer class consistent with TWC § 13.043(j) and 16 TAC §
3 24.101(i).

4 **Q. Please briefly describe how you arrived at this monthly water base rate (minimum**
5 **charge).**

6 A. To begin, I used the water revenue requirement of \$213,826 provided by Ms. Givens.¹³
7 I then applied the same overall allocation for fixed costs as was provided in the TRWA
8 rate analysis.¹⁴ This allocation resulted in a fixed cost revenue requirement amount of
9 \$131,464 for water service. Next, I divided this fixed cost revenue requirement amount
10 by the annualized meter count¹⁵ to arrive at a monthly water base rate (minimum charge)
11 of \$40.43 per connection. For a detailed description of the rate design for the monthly
12 water base rate (minimum charge), please see Attachment SJM-3.

13 **Q. Have you calculated new water volumetric tiered charges using Staff's water**
14 **revenue requirement?**

15 A. Yes. While the volumetric rates are not part of the appeal, I have calculated new water
16 volumetric tiered rates to clear up any confusion about what revenues WOWSC should
17 recover from its provision of water service resulting from Staff's recommended revenue
18 requirement and calculated rates. Accordingly, Staff's newly proposed water volumetric
19 rates, in combination with Staff's proposed water base rate (minimum charge) will

¹² *Id.*

¹³ *Id.*

¹⁴ The allocation applied to water fixed costs is 61.48%. This allocation calculation can be found in Attachment SJM-5.

¹⁵ For the annualized meter count, I used the meter connection count of 271, as identified by Mike Nelson on page 8 of his direct testimony as well as in WOWSC's response to Staff 1-8.

properly recover Staff's proposed water revenue requirement of \$213,826.¹⁶ See Attachment SJM-3 for Staff's proposed rates and projected revenue recovery for WOWSC's provision of water service.

Q. What are the just and reasonable water volumetric tiered charges using Staff's water revenue requirement?

A. Please refer to Attachment SJM-3 for the calculation of Staff's water volumetric tiered charges for Windermere as shown below:

- 0 – 2,000 gallons: \$3.90 per 1,000 gallons
- 2,001 – 4,000 gallons: \$4.93 per 1,000 gallons
- 4,001 – 8,000 gallons: \$6.92 per 1,000 gallons
- 8,001 – 15,000 gallons: \$9.68 per 1,000 gallons
- 15,001 or more gallons: \$13.30 per 1,000 gallons

These calculated tiered charges are based on the revenue requirement recommended by Ms. Givens,¹⁷ and gallonage billing units provided by Mr. Nelson in Revised Attachment MN-6.¹⁸ While the water volumetric rates were not part of the appeal, these newly proposed water volumetric rates are sufficient, equitable, and consistent in application to each customer class consistent with TWC § 13.043(j) and 16 TAC § 24.101(i).

Q. Please briefly describe how you arrived at the proposed water volumetric tiered rates.

A. To begin, I used the water revenue requirement of \$213,826 provided by Ms. Givens.¹⁹ I then applied the same overall allocation for variable costs as was provided in the TRWA

¹⁶ Givens Supplemental Direct at 6.

¹⁷ *Id.*

¹⁸ Errata—Rebuttal Testimony of Mike Nelson, at Revised Attachment MN-6, (Dec. 19, 2022).

¹⁹ Givens Supplemental Direct at 6.

1 rate analysis.²⁰ This allocation resulted in a variable cost revenue requirement amount
2 of \$82,363 for volumetric water service. Next, I calculated the annual revenue
3 percentage of the test year total revenue for each tier using the gallonage billing units
4 and revenue data provided in Mr. Nelson's Revised Attachment MN-6.²¹ During this
5 step, I combined the revenue data for the 8,001 – 10,000 gallon tier and the 10,001 –
6 15,000 gallon tier since these two tiers are currently assigned the same rate of \$13.00 per
7 1,000 gallons. I then multiplied each tier's annual revenue percentage by Staff's variable
8 cost revenue requirement amount of \$82,363 to arrive at the annual revenue for each tier.
9 Next, I divided each tier's annual revenue from the previous step by the total test year
10 gallonage billing units for each corresponding tier as provided in Mr. Nelson's Revised
11 Attachment MN-6. For this step, I again combined the gallonage usage data for the 8,001
12 – 10,000 gallon tier and the 10,001 – 15,000 gallon tier since these two tiers are currently
13 assigned the same rate of \$13.00 per 1,000 gallons. Finally, I then multiplied the
14 previous step by 1,000 to convert the final amount into a \$/1,000 gallon rate. For
15 workpapers showing the calculations of the rate design for the water volumetric tiered
16 rates, please see Attachment SJM-3.

17 **Q. Has Staff recommended a wastewater revenue requirement for WOWSC?**

18 A. Yes. Ms. Givens has recommended a wastewater revenue requirement of \$142,551 for
19 WOWSC.²² Please see Ms. Givens' testimony for an explanation of how she arrived at
20 the wastewater revenue requirement for WOWSC.

²⁰ The allocation applied to water variable costs is 38.52%. This allocation calculation can be found in Attachment SJM-5.

²¹ See Attachment SJM-4 for the calculation of the annual revenue percentage for each tier.

²² Givens Supplemental Direct at 6.

Q. Have you calculated a new monthly wastewater base rate (minimum charge) using Staff's wastewater revenue requirement?

A. Yes.

Q. What is the just and reasonable monthly wastewater base rate (minimum charge) for wastewater service for WOWSC?

A. Please refer to Attachment SJM-3 for the calculation of Staff's wastewater base rate (minimum charge) of \$29.81 for WOWSC. This calculated rate is based on the wastewater revenue requirement recommended by Ms. Givens,²³ and the gallonage billing units provided by Mr. Nelson in Revised Attachment MN-6. The rate is sufficient, equitable, and consistent in application to each customer class consistent with TWC § 13.043(j) and 16 TAC § 24.101(i).

Q. Please briefly describe how you arrived at this monthly wastewater base rate (minimum charge).

A. To begin, I used the wastewater revenue requirement amount of \$142,551 provided by Ms. Givens.²⁴ I then applied the same overall allocation for fixed costs as was provided in the TRWA rate analysis.²⁵ This allocation resulted in a fixed cost amount of \$87,643 for wastewater. Next, I divided this fixed cost amount by the annualized meter count²⁶ to arrive at a monthly base water rate (minimum charge) of \$29.81 per connection. For

²³ *Id.*

²⁴ *Id.*

²⁵ The allocation applied to wastewater fixed costs is 61.48%. This allocation calculation can be found in Attachment SJM-5.

²⁶ Direct Testimony of Joe Gimenez at 9, (Mar. 10, 2021).

a detailed description of the rate design for the monthly wastewater base rate (minimum charge), please see Attachment SJM-3.

Q. Have you calculated a new wastewater volumetric rate using Staff's wastewater revenue requirement?

A. Yes. While the wastewater volumetric rate was not part of the appeal, I have calculated a new wastewater volumetric rate to clear up any confusion about what revenues WOWSC should recover from its provision of wastewater service as a result of Staff's recommended revenue requirement and resulting rates. Accordingly, Staff's newly proposed wastewater volumetric rate, in combination with Staff's proposed monthly wastewater base rate (minimum charge) of \$29.81 described above in my testimony, will properly recover the Staff proposed wastewater revenue requirement of \$142,551.

Q. What is the just and reasonable wastewater volumetric rate using Staff's wastewater revenue requirement?

A. Please refer to Attachment SJM-3 for the calculation of Staff's volumetric wastewater rate of \$6.55/1,000 gallons for WOWSC. The calculated wastewater volumetric rate is based on the revenue requirement recommended by Ms. Givens,²⁷ and the gallonage billing units provided by Mr. Nelson in Revised Attachment MN-6. While the wastewater volumetric rate was not part of the appeal, the newly proposed wastewater volumetric rate is sufficient, equitable, and consistent in application to each customer class consistent with TWC § 13.043(j) and 16 TAC § 24.101(i).

Q. Please briefly describe how you arrived at the proposed wastewater volumetric rate.

²⁷ Givens Supplemental Direct at 6.

1 A. To begin, I used the wastewater revenue requirement of \$142,551 provided by Ms.
2 Givens.²⁸ I then applied the same overall allocation for variable costs as was provided
3 in the TRWA rate analysis.²⁹ This allocation resulted in a variable cost revenue
4 requirement amount of \$54,909 for volumetric wastewater service. Next, I divided this
5 amount by the total test year wastewater gallonage billing units as provided in Mr.
6 Nelson's Revised Attachment MN-6. Finally, I then multiplied the previous step by
7 1,000 to convert the final amount into a \$/1,000 gallon rate.

8 **Q. Please describe how your proposed rates will properly recover Staff's proposed**
9 **revenue requirement amount of \$356,378.**

10 A. Using the test year meter connection counts provided by WOWSC,³⁰ Staff's proposed
11 rates for the monthly water and wastewater base rates (minimum charge) are projected
12 to recover approximately \$219,106. Using the test year gallonage billing units provided
13 by WOWSC in Mr. Nelson's Revised Attachment MN-6, Staff's proposed volumetric
14 rates for water and wastewater service are projected to recover approximately \$137,272.
15 Combining both projected recovery amounts from minimum charges and volumetric
16 rates as described above results in a total projected recovery of approximately \$356,378
17 (\$219,106 + \$137,272 = \$356,378). Please see Attachment SJM-6 for a detailed
18 calculation of Staff's projected revenue recovery.

²⁸ *Id.*

²⁹ The allocation applied to wastewater variable costs is 38.52%. This allocation calculation can be found in Attachment SJM-5.

³⁰ For a water meter count of 271, and wastewater meter count of 245, see Gimenez Direct at 9.

Q. Using the test year meter connection counts and gallonage billing units provided by WOWSC, please demonstrate what WOWSC's current rates are projected to recover.

A. Using the test year meter connection counts provided by WOWSC,³¹ WOWSC's current rates for the water and wastewater base rates (minimum charge) are projected to recover approximately \$489,194. Using the test year gallonage billing units provided by WOWSC in Mr. Nelson's Revised Attachment MN-6, WOWSC's current volumetric rates for water and wastewater service are projected to recover approximately \$108,056. Combining both projected recovery amounts results in a total projected recovery of approximately \$597,250 (\$489,194 + \$108,056 = \$597,250). Please see Attachment SJM-6 for a detailed calculation of WOWSC's projected revenue recovery using current rates.

Q. Does the projected revenue recovery using WOWSC's current rates match the revenue requirement identified in the TRWA rate analysis originally provided by WOWSC?

A. No. The TRWA rate analysis originally provided by WOWSC identified a revenue requirement amount of approximately \$576,192. As discussed above, WOWSC's current rates appear to recover a projected amount of \$597,250. While the difference is not extreme, I point it out only to demonstrate that it is possible that WOWSC's current volumetric rates for water and wastewater are designed to recover a proportionate revenue amount that is decidedly different than the revenue requirement amount of \$576,192 identified in the TRWA rate analysis. All of this is assuming the current

³¹ See WOWSC replies to Staff 1-8 and Staff 1-15, (Nov. 9, 2020).

1 monthly water and wastewater base rates (minimum charges) have been designed to
2 recover the revenue requirement identified in the TRWA rate analysis. Consistent with
3 the discussion earlier in my testimony, it is my opinion that the current monthly water
4 and wastewater base rates (minimum charges) have not been designed to properly
5 recover the revenue requirement identified in the TRWA rate analysis. Conversely, my
6 proposed rates have been designed to reasonably recover Staff's proposed revenue
7 requirement of \$356,378.

8
9 **VI. CONCLUSION**

10 **Q. What is your recommendation with respect to the monthly water base rate**
11 **(minimum charge) that is currently being charged by WOWSC?**

12 A. Based upon my review of materials in this proceeding, along with the water revenue
13 requirement established by Ms. Givens, I recommend a new monthly water base rate
14 (minimum charge) of \$40.43. I also recommend that the Commission order WOWSC to
15 replace the current monthly water base rate (minimum charge) with Staff's proposed
16 monthly water base rate (minimum charge) of \$40.43.

17 **Q. What is your recommendation with respect to the wastewater base rate (minimum**
18 **charge) that is currently being charged by WOWSC?**

19 A. Based upon my review of materials in this proceeding, along with the wastewater
20 revenue requirement established by Ms. Givens, I recommend a new monthly wastewater
21 base rate (minimum charge) of \$29.81. I also recommend that the Commission order
22 WOWSC to replace the current monthly wastewater base rate (minimum charge) with
23 Staff's proposed monthly wastewater base rate (minimum charge) of \$29.81.

Q. What is your recommendation with respect to the water volumetric tiered rates that are currently being charged by WOWSC?

A. Based upon my review of materials in this proceeding, along with the water revenue requirement established by Ms. Givens, I recommend that the Commission order WOWSC to replace its current tiered water volumetric rates with Staff's proposed water volumetric tiered rates as follows:

- 0 – 2,000 gallons: \$3.90 per 1,000 gallons
- 2,001 – 4,000 gallons: \$4.93 per 1,000 gallons
- 4,001 – 8,000 gallons: \$6.92 per 1,000 gallons
- 8,001 – 15,000 gallons: \$9.68 per 1,000 gallons
- 15,001 or more: \$13.30 per 1,000 gallons

When combined with the proposed monthly water base rate (minimum charge) of \$40.43, the water volumetric tiered rates as identified above are designed to recover Staff's proposed water revenue requirement of \$213,826.

Q. What is your recommendation with respect to the wastewater volumetric rate that is currently being charged by WOWSC?

A. Based upon my review of materials in this proceeding, along with the wastewater revenue requirement established by Ms. Givens, I recommend a new volumetric rate of \$6.55 per 1,000 gallons for wastewater service. When combined with the proposed monthly wastewater base rate (minimum charge) of \$29.81, the wastewater volumetric rate as identified above is designed to recover Staff's proposed wastewater revenue requirement of \$142,551.

Q. Does this conclude your supplemental direct testimony?

A. Yes.

Stephen J. Mendoza
Public Utility Commission of Texas
1701 North Congress Avenue
Austin, TX 78711-3326

REGULATORY EXPERIENCE

Senior Rate Analyst:

Public Utility Commission of Texas, Rate Regulation Division, Tariff and Rate Analysis Section

Employed from October 1996 to present.

Duties: Performs analysis of utility cost allocation, rate design, and tariff filings. Analyzes cost allocation studies and rate design issues for regulated utilities. Reviews tariffs of regulated utilities to determine compliance with Commission requirements. Analyzes policy issues associated with the regulation of the electric and water industry. Works on contested cases, reports, and research concerning pricing and other related issues. Prepares and provides testimony as an expert witness on rate and related issues in docketed proceedings before the Commission and the State Office of Administrative Hearings.

EDUCATION

Economics: The University of Texas at Austin
Bachelor of Arts, May 1996

TESTIMONY

1. P.U.C. Docket No. 35668, *Application of Southwestern Public Service Company for Authority to (1) Revise Its Interruptible Credit Option Tariff; (2) Implement New Saver's Switch Tariff and Related Relief*
2. SOAH Docket No. 473-08-3436 and P.U.C. Docket No. 35763, *Application of Southwestern Public Service Company for Authority to Change Rates, to Reconcile Fuel and Purchased Power Costs for 2006 and 2007, and to Provide a Credit for Fuel Cost Savings*
3. P.U.C. Docket No. 36918, *Application of CenterPoint Houston Electric, LLC for Determination of Hurricane Restoration Costs*

4. SOAH Docket No. 473-09-5194 and P.U.C. Docket No. 36961, *Application of Southwestern Electric Power Company to Adjust Energy Efficiency Cost Recovery Factor and Relief*
5. SOAH Docket No. 473-09-0258 and P.U.C. Docket No. 37173, *Petition of Declaratory Order of Southwestern Public Service Company Regarding the Generation Demand Charge as a Cap on Compensation for Interruptible Resources.*
6. SOAH Docket No. 473-10-1962 and P.U.C. Docket No. 37744, *Application of Entergy Texas, Inc. for Authority to Change Rates and Reconcile Fuel Costs*
7. P.U.C. Docket No. 38951, *Application of Entergy Texas, Inc. for Approval of Competitive Generation Service Tariff (Issues Severed from Docket No. 37744)*
8. SOAH Docket No. 473-14-3445 and P.U.C. Docket No. 42485, *Application of Entergy Texas, Inc. for Authority to Redetermine Rates for Energy Efficiency Cost Factor*
9. SOAH Docket No. 473-18-3823 and P.U.C. Docket No. 48205 *Complaint of Philip Brunette Against Palm Shadows Resort, LLC, Palm Shadows MH & RV Park and Affordable Housing Communities, LLC Regarding Electric and Water Service Billings*
10. SOAH Docket No. 473-21-0477.WS and P.U.C. Docket No. 50557 *Application of Corix Utilities (Texas), Inc. for Authority to Change Rates*
11. SOAH Docket No. 473-21-0477.WS and P.U.C. Docket No. 50788 *Ratepayers Appeal of the Decision by Windermere Oaks Water Supply Corporation to Change Water and Sewer Rates*

ATTACHMENT SJM-2

Responses to STAFF RFIs: Staff RFI No. 1-12

Staff RFI No. 1-16

Staff RFI No. 5-8

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WOWSC'S RESPONSE TO STAFF'S FIRST RFI

Staff 1-12 Please identify the revenue requirement that was used to calculate the sewer rates that are the subject of this appeal.

RESPONSE: See response to Staff 1-5. WOWSC only calculated one revenue requirement for both water and waste water.

Prepared by: Mike Nelson
Sponsored by: Mike Nelson

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WOWSC'S RESPONSE TO STAFF'S FIRST RFI

Staff 1-16 For any expenses that are not exclusively incurred to provide either water or sewer service, please explain how Windermere allocated these expenses between the revenue requirement used to calculate the appealed water rates and the revenue requirement used to calculate the appealed sewer rates.

RESPONSE: See Attachment Staff 1-1. TRWA Employee James Smith's analysis supports a WOWSC rate increase of \$65.73 per month. In Mr. Smith's analysis, he only applied an increase to water services and not to both water and waste water services. The analysis shows Water min charge increase from \$50.95 to \$116.68.

$$\$50.95 + \$65.73 = \$116.68$$

Approximately 60% of WOWSC's service revenue is for water and the other ~40% of service revenue is for waste water. Partitioning the rate increase:

1. $\$65.73 \times 0.60 = \39.44
2. $\$65.73 \times 0.40 = \26.29

The Rate analysis supports new Water min charge: $\$50.95 + \$39.44 = \$90.39$ and new Waste Water min charge: $\$40.12 + \$26.29 = \$66.41$

The Rate analysis supports new total min charge: $\$90.39 + \$66.41 = \$156.80$.

Cost increases to be spread evenly across all members and are not based on water usage.

Mr. Smith's suggested minimum bill of \$174.59 is based on TRWA's recommendation to use updated depreciation rates. WOWSC did not update the depreciation rates and determined that a \$174.59 minimum bill created too much of a rate increase and adopted a \$156.80 minimum bill.

Prepared by: Mike Nelson
Sponsored by: Mike Nelson

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

WOWSC'S RESPONSE TO STAFF'S FIFTH RFI

STAFF 5-8 Please reference the Rebuttal Testimony of Joe Gimenez. On page 5, Mr. Gimenez states that "Mr. Mendoza's recommended monthly base rates of \$45.92 for water and \$33.87 for wastewater would fall short of recovering Staff's recommended total revenue requirement of \$404,855..." Is it the contention of Mr. Gimenez that the costs associated with water and wastewater volumetric service are included in the revenue requirement of \$576,192 identified in the TRWA Rate Analysis (Attachment MN-2 of the Direct Testimony of Mike Nelson)?

RESPONSE: Yes.

Prepared by: Joe Gimenez
Sponsored by: Joe Gimenez

WOWSC WATER AND WASTEWATER REVENUE REQUIREMENT						
	Windermere Oaks			60%	40%	
	Water Supply Corporation		Staff-Adjusted	Water	Wastewater	
	Total Revenue	Staff	Total Revenue	Revenue	Revenue	
	Requirement	Adjustment	Requirement	Requirement	Requirement	
OPERATIONS & MAINTENANCE COSTS						
Contract Labor	\$ 117,865		\$ 117,865	\$ 70,719	\$ 47,146	
Chemicals and Treatment	\$ 12,035		\$ 12,035	\$ 7,221	\$ 4,814	
Utilities	\$ 20,922		\$ 20,922	\$ 12,553	\$ 8,369	
Repairs and Maintenance	\$ 71,060		\$ 71,060	\$ 42,636	\$ 28,424	
Office Expenses - Billing	\$ 15,679		\$ 15,679	\$ 9,407	\$ 6,272	
Accounting and Legal	\$ 171,337	\$ (171,337)	\$ -	\$ -	\$ -	
Office Supplies	\$ 4,707		\$ 4,707	\$ 2,824	\$ 1,883	
Telephone	\$ 6,549		\$ 6,549	\$ 3,929	\$ 2,620	
Travel and Entertainment	\$ 1,130		\$ 1,130	\$ 678	\$ 452	
Equipment Rental	\$ 250		\$ 250	\$ 150	\$ 100	
Insurance - WC and Liability	\$ 14,160		\$ 14,160	\$ 8,496	\$ 5,664	
License and Dues	\$ 178		\$ 178	\$ 107	\$ 71	
Postage and Freight	\$ 2,710		\$ 2,710	\$ 1,626	\$ 1,084	
Sampling	\$ 8,459		\$ 8,459	\$ 5,075	\$ 3,384	
Depreciation	\$ 56,273		\$ 56,273	\$ 33,764	\$ 22,509	
Materials and Supplies	\$ 6,730		\$ 6,730	\$ 4,038	\$ 2,692	
Miscellaneous	\$ 1,250		\$ 1,250	\$ 750	\$ 500	
Purchased Water	\$ 8,490		\$ 8,490	\$ 5,094	\$ 3,396	
Slug Removal	\$ 2,363		\$ 2,363	\$ 1,418	\$ 945	
Bookkeeping	\$ 4,163		\$ 4,163	\$ 2,498	\$ 1,665	
SUBTOTAL - OPERATIONS & MAINTENANCE	\$ 526,310	\$ (171,337)	\$ 354,973	\$ 212,984	\$ 141,989	
Long Term Debt	49,882		49,882	\$ 29,929	\$ 19,953	
NET REVENUE REQUIREMENT	\$ 576,192	\$ (171,337)	\$ 404,855	\$ 242,913	\$ 161,942	
Other Revenues - Standby Fees			(41,672)	(25,003)	(16,669)	
Other Revenues - Late Fees			(6,806)	(4,083)	(2,722)	
Other Revenues - Membership Fee			-	-	-	
Other Revenues - Equity Buy In Fees			-	-	-	
Other Revenues - Tap Fees			-	-	-	
Other Revenues - Miscellaneous			-	-	-	
			-	-	-	
Subtotal Other Revenues			(48,477)	(29,086)	(19,391)	
NET REVENUE REQUIREMENT FOR RATES			356,378	213,826	142,551	

	WINDERMERE SYSTEM	WATER	WASTEWATER
STAFF NET REVENUE REQUIREMENT	\$356,378	\$213,826	\$142,551

WATER RATE DESIGN

WOWSC SYSTEM REVENUE REQUIREMENT
\$356,378

As provided by Staff witness Anna Givens

WATER REVENUE REQUIREMENT
\$213,826

As provided by Staff witness Anna Givens

FIXED REVENUE for WATER RATE DESIGN
\$131,464

(\$213,826 * 0.6148 = \$131,464)

VARIABLE REVENUE for WATER RATE DESIGN
\$82,363

(\$213,826 * 0.3852 = \$82,363)

Description	Amount
Water Fixed Revenue	\$131,464
Test Year Meter Equivalencies	271
Billing Cycles per Year	12
Base Rate	\$40.43

Residential/Commercial	Meters	Multiplier	Conn. Equiv.	Base Rate	Base Rate Revenue	Staff Recommended Rate
5/8" x 3/4" connections	271	1.00	271	\$40.43	\$10,955	\$40.43
Annualized amount:					\$131,464	

Multi-Tiered Rates (Residential/Commercial)			
Gallage Tier (Gallons)	Revenue (\$)	Gallons Billed (Gallons)	Rate per 1,000 Gallons
0 - 2,000	\$3,831	983,240.0	\$3.90
2,001 - 4,000	\$10,548	2,139,400.0	\$4.93
4,001 - 8,000	\$19,307	2,791,000.0	\$6.92
8,001 - 15,000	\$16,833	1,739,300.0	\$9.68
15,001 or more	\$31,844	2,393,700.0	\$13.30
	\$82,363	10,046,640	

Var. Rev. Req.
\$82,363

Total Staff projected revenue recovery (Water): \$213,826

WASTEWATER RATE DESIGN

WOWSC SYSTEM REVENUE REQUIREMENT	
\$356,378	As provided by Staff witness Anna Givens

WASTEWATER REVENUE REQUIREMENT	
\$142,551	As provided by Staff witness Anna Givens

FIXED REVENUE for WASTEWATER RATE DESIGN	
\$87,643	(\$142,551 * 0.6148 = \$87,643)

VARIABLE REVENUE for WASTEWATER RATE DESIGN	
\$54,909	(\$142,551 * 0.3852 = \$54,909)

Wastewater Fixed Revenue	
Description	Amount
Wastewater Fixed Revenue	\$87,643
Test Year Meter Equivalencies	245
Billing Cycles per Year	12
Base Rate	29.81

Residential	Meters	Multiplier	Conn. Equiv.	Base Rate	Base Rate Revenue	Staff Recommended Rate
Number of 5/8" x 3/4"connections:	245	1.00	245	\$ 29.81	\$ 7,303.56	\$ 29.81
Total =	245		245		\$ 87,642.72	

Wastewater Volumetric Rate (Residential/Commercial)				Wastewater Variable Rev.
Gallonge Tier (Gallons)	Revenue (\$)	Gallons Billed (Gallons)	Staff Rate per 1,000 Gallons	
Single Tier	\$ 54,909	8,378,340	\$ 6.55	\$54,909

Total Staff projected revenue recovery (Wastewater): \$ 142,551

Revised Attachment MN-6

			Accounts	Gallonage	Revenue	Accounts	Gallonage	Revenue
			January	January	January	February	February	February
WWTP gallons				140,700			125,400	
Process Meter				26,200			23,300	
Water Leaks/Flush							300,000	
				166,900			448,700	
Water Service Rates								
Base charge	\$50.95	per meter						
0 gallons			52	0		56	0	
0 - 2000 gallons	\$3.55	per 1000 gallons	107	96600	\$342.93	111	93000	\$330.15
2001 - 4000 gallons	\$6.50	per 1000 gallons	63	184300	\$826.25	67	200900	\$910.55
4001 - 8000 gallons	\$9.75	per 1000 gallons	40	216400	\$1,353.90	29	153300	\$946.58
8001 - 10000 gallons	\$13.00	per 1000 gallons	3	28100	\$230.60	3	25400	\$195.50
10001 - 15000 gallons	\$13.00	per 1000 gallons	0	0	\$0.00	1	10,300	\$89.00
15001 or more	\$15.00	per 1000 gallons	4	239,000	\$3,285.40	1	31,400	\$396.10
		Gallonage Total	269	764,400	\$6,039.08	268	514,300	\$2,867.88
Sewer Service Rates								
Base Charge	\$40.12	per meter	239			239		
1 - 10000 gallons	\$3.94	per 1000 gallons		565400	\$2,227.68		492600	\$1,940.84

\$166,810.30 water base rate revenue
\$75,045.35 water gallonage revenue
\$116,668.96 waste-water base rate revenue
\$33,010.66 waste-water gallonage revenue

\$391,535.27 Total Projected Revenue Y2019 Water + Waste-Water Services

\$369,541.10 Actual Y2019 Water & Sewer Services Revenue

SOAH DOCKET NO. 473-20-4071.WS
PUC DOCKET NO. 50788
COMPANY NAME Windermere Water Supply Corporation

Attachment SJM-4
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Revised Attachment MN-6

Accounts	Gallonage	Revenue	Accounts	Gallonage	Revenue	Accounts	Gallonage	Revenue	Accounts	Gallonage	Revenue
March	March	March	April	April	April	May	May	May	June	June	June
	119,100			127,200			166,900			187,000	
	19,100			20,800			22,800			22,000	
							16,000			16,000	
	138,200			148,000			205,700			225,000	
51	0		51	0		49	0		44	0	
114	89500	\$317.73	110	91800	\$325.89	101	81500	\$289.33	102	82900	\$294.30
64	182900	\$811.25	60	187000	\$861.50	61	172600	\$762.00	64	193100	\$877.55
30	155700	\$951.08	37	204000	\$1,289.70	44	234300	\$1,452.83	36	195700	\$1,227.68
3	27400	\$221.50	5	44200	\$350.10	6	52300	\$410.50	9	82000	\$661.90
5	61,100	\$569.80	3	44,800	\$447.70	3	36,800	\$343.70	9	111,100	\$1,040.20
1	19,100	\$211.60	5	97,300	\$1,085.00	5	124,900	\$1,499.00	7	159,400	\$1,866.70
268	535,700	\$3,082.95	271	669,100	\$4,359.89	269	702,400	\$4,757.35	271	824,200	\$5,968.32
238			241			240			242		
	515500	\$2,031.07		607000	\$2,391.58		620700	\$2,445.56		713700	\$2,811.98

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COMPANY NAME Windermere Water Supply Corporation

Attachment SJM-4
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Revised Attachment MN-6

Accounts	Gallonage	Revenue	Accounts	Gallonage	Revenue	Accounts	Gallonage	Revenue	Accounts	Gallonage	Revenue
July	July	July	August	August	August	September	September	September	October	October	October
	197,100			193,100			208,700			175,900	
	20800			21,100			11,000				
	275000										
	492,900			214,200			219,700			175,900	
41	0		42	0		42	0		48	0	
86	62100	\$220.46	73	52800	\$187.44	92	75040	\$266.39	102	80100	\$284.36
63	181500	\$808.05	55	159700	\$713.55	37	114500	\$525.95	57	167800	\$754.40
53	294400	\$1,868.70	55	330100	\$2,178.98	50	281500	\$1,799.63	51	289200	\$1,855.80
11	100500	\$812.60	11	100300	\$810.00	8	72300	\$580.70	9	81600	\$656.70
8	94600	\$870.60	16	198,700	\$1,864.70	21	257,900	\$2,409.80	12	149,600	\$1,406.00
9	246,900	\$3,029.40	17	343,100	\$3,873.20	28	665,700	\$7,888.30	6	142,200	\$1,683.60
271	980,000	\$7,609.81	269	1,184,700	\$9,627.87	278	1,466,940	\$13,470.77	285	910,500	\$6,640.86
241			243			245			249		
	808500	\$3,185.49		972900	\$3,833.23		1033340	\$4,071.36		798700	\$3,146.88

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Revised Attachment MN-6

Accounts	Gallonage	Revenue	Accounts	Gallonage	Revenue		Y2019		
November	November	November	December	December	December		Totals		
	130,200			129,000			1,900,300		
							187,100		
							607,000		
	130,200			129,000					
						Accounts	Gallonage	Revenue	
						Totals	Totals	Totals	
49	0		52	0		577	0	Y2019	Revenue %
104	83400	\$296.07	104	94500	\$335.48	1206	983,240	3490.50	4.65%
75	212700	\$940.05	62	182400	\$819.80	728	2,139,400	9610.90	12.81%
41	213000	\$1,301.85	43	223400	\$1,365.45	509	2,791,000	17592.15	23.44%
4	37400	\$306.60	5	43200	\$337.10	77	694,700	5573.80	7.43%
5	59,200	\$545.10	2	20,500	\$176.70	85	1,044,600	9763.30	13.01%
4	170,200	\$2,253.40	5	154,500	\$1,943.00	92	2,393,700	29014.70	38.66%
282	775,900	\$5,643.07	273	718,500	\$4,977.53	3,274	10,046,640	\$75,045.35	100.00%
246			245			2908	sum	sum	
	636500	\$2,507.81		613500	\$2,417.19		8,378,340	\$33,010.66	

TRWA Rate Analysis & Revenue Requirement							
				A	B	C	D
Line No.	Account Name	Test Year Total	Company Adjustments	Company Adjusted Test Year Expenses	Fixed % of Col. A	Fixed Expenses C = A * B	Variable Expenses D = A - C
1.	SALARIES	0	0	0	78%	0	0
2.	CONTRACT LABOR	117,865	0	117,865	75%	88,399	29,466
3.	CHEMICALS AND TREATMENT	12,035	0	12,035	60%	7,221	4,814
4.	UTILITIES	20,922	0	20,922	70%	14,645	6,277
5.	REPAIRS AND MAINTENANCE	71,060	0	71,060	50%	35,530	35,530
6.	OFFICE EXPENSES BILLING	15,679	0	15,679	45%	7,056	8,623
7.	ACCOUNTING & LEGAL	171,337	0	171,337	50%	85,669	85,669
8.	HEALTH INSURANCE	0	0	0	50%	0	0
9.	OFFICE SUPPLIES	4,707	0	4,707	45%	2,118	2,589
10.	TANK REPAIRS	0	0	0	50%	0	0
11.	BAD DEBT	0	0	0	50%	0	0
12.	PAYROLL TAXES	0	0	0	50%	0	0
13.	TELEPHONE	6,549	0	6,549	40%	2,620	3,929
14.	TRUCK & EQUIP. EXPENSE	0	0	0	50%	0	0
15.	TRAVEL & ENTERTAINMENT	1,130	0	1,130	50%	565	565
16.	EQUIPMENT RENTAL	250	0	250	50%	125	125
17.	INSURANCE - WC & LIABILITY	14,160	0	14,160	70%	9,912	4,248
18.	LICENSE & DUES	178	0	178	50%	89	89
19.	POSTAGE & FREIGHT	2,710	0	2,710	50%	1,355	1,355
20.	ADVERTISING	0	0	0	30%	0	0
21.	SAMPLING	8,459	0	8,459	50%	4,230	4,230
22.	EDUCATION	0	0	0	50%	0	0
23.	DEPRECIATION	56,273	0	56,273	60%	33,764	22,509
24.	MATERIALS & SUPPLIES	6,730	0	6,730	50%	3,365	3,365
25.	SECURITY	0	0	0	50%	0	0
26.	MISCELLANEOUS	1,250	0	1,250	50%	625	625
27.	LONG TERM DEBT	49,882	0	49,882	100%	49,882	0
28.	PURCHASED WATER	8,490	0	8,490	45%	3,821	4,670
29.	SLUG REMOVAL	2,363	0	2,363	50%	1,182	1,182
30.	BOOKKEEPING	4,163	0	4,163	50%	2,082	2,082
31.	TOTAL EXPENSES	576,192	0	576,192		354,252	221,940
32.	REQUESTED RETURN	0		0			
33.	TOTAL REVENUE REQUIREMENT	576,192	0	576,192		354,252	221,940
34.	LESS: OTHER REVENUES	0		0			
35.	REVENUE for RATE DESIGN	576,192	0	576,192		354,252	221,940

FIXED COST PERCENTAGE*
61.4815%

VARIABLE COST PERCENTAGE*
38.52%

*Overall fixed cost percentages are calculated from the TRWA analysis as provided in the direct testimony of Mike Nelson (Attachment MN-2).

PROJECTED REVENUE RECOVERY FROM WOWSC'S CURRENT RATES

WATER					
Residential/Commercial	Meters	Multiplier	Conn. Equiv.	Base Rate	Base Rate Revenue
Number of 5/8" x 3/4"connections:	271	1.00	271	\$ 90.39	\$ 24,496
Total =	271		271		\$ 293,948

WASTEWATER					
Residential/Commercial	Meters	Multiplier	Conn. Equiv.	Base Rate	Base Rate Revenue
Number of 5/8" x 3/4"connections:	245	1.00	245	\$ 66.41	\$ 16,270
Total =	245		245		\$ 195,245

Total recovery from minimum charge: \$ 489,194

Water Multi-Tiered Volumetric Rates (Residential/Commercial)				
Gallage Tier (Gallons)	Revenue (\$)	Meter Counts	Gallons Billed (Gallons)	Rate per 1,000 Gallons
0 - 2,000	\$ 3,491	1206	983,240	\$3.55
2,001 - 4,000	\$ 9,611	728	2,139,400	\$6.50
4,001 - 8,000	\$ 17,592	509	2,791,000	\$9.75
8,001 - 10,000	\$ 5,574	77	694,700	\$13.00
10,001 - 15,000	\$ 9,763	85	1,044,600	\$13.00
15,001 or more	\$ 29,015	92	2,393,700	\$15.00
	\$ 75,045		10,046,640	

Projected water volumetric recovery
\$ 75,045

Wastewater Volumetric Rate (Residential/Commercial)			
Gallage Tier (Gallons)	Revenue (\$)	Gallons Billed (Gallons)	Rate per 1,000 Gallons
Single Tier	\$ 33,011	8,378,340	\$ 3.94
	\$ 33,011	8,378,340	

Projected wastewater volumetric recovery
\$ 33,011

Total recovery from volumetric rates: \$ 108,056

Total projected recovery from WOWSC's current rates: \$ 597,250

PROJECTED REVENUE RECOVERY FROM STAFF'S PROPOSED RATES

WATER					
Residential/Commercial	Meters	Multiplier	Conn. Equiv.	Base Rate	Base Rate Revenue
Number of 5/8" x 3/4"connections:	271	1.00	271	\$ 40.43	\$ 10,955
Total =	271		271		\$ 131,464

WASTEWATER					
Residential/Commercial	Meters	Multiplier	Conn. Equiv.	Base Rate	Base Rate Revenue
Number of 5/8" x 3/4"connections:	245	1.00	245	\$ 29.81	\$ 7,304
Total =	245		245		\$ 87,643

Total recovery from minimum charge: \$ 219,106

Water Multi-Tiered Volumetric Rates (Residential/Commercial)			
Gallage Tier (Gallons)	Revenue (\$)	Gallons Billed (Gallons)	Rate per 1,000 Gallons
0 - 2,000	\$ 3,831	983,240	\$3.90
2,001 - 4,000	\$ 10,548	2,139,400	\$4.93
4,001 - 8,000	\$ 19,307	2,791,000	\$6.92
8,001 - 10,000	\$ 6,723	694,700	\$9.68
10,001 - 15,000	\$ 10,109	1,044,600	\$9.68
15,001 or more	\$ 31,844	2,393,700	\$13.30
	\$ 82,363	10,046,640	

Projected water volmetric recovery
\$ 82,363

Wastewater Volumetric Rate (Residential/Commercial)			
Gallage Tier (Gallons)	Revenue (\$)	Gallons Billed (Gallons)	Rate per 1,000 Gallons
Single Tier	\$ 54,909	8,378,340	\$ 6.55
	\$ 54,909	8,378,340	

Projected wastewater volumetric recovery
\$ 54,909

Total recovery from volumetric rates: \$ 137,271

Total projected recovery from Staff proposed rates: \$ 356,378

The following files are not convertible:

50788 (SJM-3 thru SJM-6)
attachments.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.