



Filing Receipt

Received - 2023-03-10 12:38:02 PM

Control Number - 50788

ItemNumber - 325

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

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

**WINDERMERE OAKS WATER SUPPLY CORPORATION SUPPLEMENTAL
RESPONSE TO RATEPAYERS' AMENDED SIXTH REQUEST FOR INFORMATION**

Windermere Oaks Water Supply Corporation (WOWSC) files this Supplemental Response to the Amended Sixth Request for Information (RFI) filed by Ratepayers. The discovery request was received by WOWSC after the filing deadline on January 20, 2023; therefore, these responses are timely filed. Pursuant to 16 Tex. Admin. Code (TAC) § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

WOWSC files this Supplemental Response to Ratepayers' Amended RFI No. 6-9.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800
(512) 472-0532 (Fax)



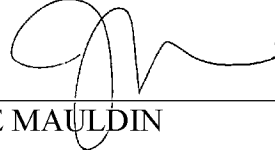
JAMIE L. MAULDIN
State Bar No. 24065694
jmauldin@lglawfirm.com

RICHARD A. ARNETT II
State Bar No. 24131230
rarnett@lglawfirm.com

**ATTORNEYS FOR WINDERMERE OAKS
WATER SUPPLY CORPORATION**

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 March 10, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE MAULDIN

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

WOWSC'S SUPPLEMENTAL RESPONSE TO RATEPAYERS AMENDED SIXTH RFI

RATEPAYERS AMENDED 6-9: For each projected expenditure within each line item/expense category set forth on Attachment Staff 8-5, please provide the following information available at the time the rate increase was approved:

- a. The amount and a detailed description of the goods and/or services expected to be purchased or acquired;
- b. How Windermere allocated such projected expenditure as between water service and sewer service, if it did;
- c. An explanation as to why such projected expenditure is reasonable and necessary, if Windermere so contends;
- d. An explanation as to how such projected expenditure is a cost of providing utility service, if Windermere so contends; and
- e. An explanation as to how the amount of such projected expenditure could have been anticipated with reasonable certainty at the time of the rate increase.

For clarity, this RFI seeks the foregoing information as to each and every projected expenditure within each line item (examples of line items are "Total 50000 – COS Operator" and "Total 63000 – Legal/Appraisal") on Windermere's 2020 budget (Attachment Staff 8-5).

RESPONSE:

- a. See Attachment GR-2 to the Rebuttal Testimony of Grant Rabon; see also Supplemental Attachment Ratepayers 8-24.
- b. See Attachment Ratepayers 4-6 at p. 5-9. See Columns "YTD Budget" and "Annual Budget" to see the budgeted allocation of costs between water and wastewater services.
- c. See Attachment GR-2 to the Rebuttal Testimony of Grant Rabon; see also Supplemental Attachment Ratepayers 8-24.
- d. WOWSC is a nonprofit corporation without shareholders. Therefore, all expenditures related to provision of water and wastewater service are a cost of providing utility service.

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

WOWSC'S SUPPLEMENTAL RESPONSE TO RATEPAYERS AMENDED SIXTH RFI

- e. To project its expenditures, WOWSC reviews expenditures from the prior year and assesses its future needs. Based on this review and assessment, it projects the upcoming year's expenditures and implements rates to recover capital accordingly.

Prepared by: Mike Nelson
Sponsored by: Mike Nelson