



## Filing Receipt

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**DOCKET NO. 53428**

**APPLICATION OF AQUA TEXAS, INC. § PUBLIC UTILITY COMMISSION  
FOR SYSTEM IMPROVEMENT §  
CHARGES § OF TEXAS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
AQUA TEXAS, INC.  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Aqua Texas, Inc., by and through its representative 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 Second Order Suspending Rules in Project No. 50664.

Dated: September 2, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Keith Rogas  
Division Director

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Interim Managing Attorney

/s/ Ian Groetsch  
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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 September 2, 2022 in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Ian Groetsch  
Ian Groetsch

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
AQUA TEXAS, INC.  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

**DEFINITIONS**

- 1) "Aqua," "your," or "you" refers to that Aqua Texas, Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "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 your 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 documents which do exist, and these documents will be provided.

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**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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- Staff 1-1** Please refer to Schedule F of the supplemental application. Please provide the underlying assumptions relied upon to determine the 22.58% tax rate used for purposes of calculating the federal income tax expense.
- Staff 1-2** Please refer to Schedule F of the supplemental application. Please confirm that Aqua intends for the use of the 22.58% rate to calculate a federal income tax expense instead of a tax deduction. If not, please explain the purpose of the tax deduction calculation.
- Staff 1-3** Please refer to the Direct Testimony of Kurt Scheibelhurt at pages 9 and 10, bates stamped 000404 and 000405 in the application. Please provide supporting documentation showing compliance with Texas Water Code § 13.185 as it relates to Aqua's use of Essential's cost of debt for purposes of the interest synchronization component of the federal income tax expense calculation.
- Staff 1-4** Please indicate whether the Commission previously approved Aqua's use of its affiliate's cost of debt for ratemaking purposes. If yes, please provide the appropriate docket reference.