



## **Filing Receipt**

**Filing Date - 2023-09-14 02:09:20 PM**

**Control Number - 54940**

**Item Number - 28**

**PUC DOCKET NO. 54940**

<b>APPLICATION OF INTEGRA WATER</b>	<b>§</b>	<b>BEFORE THE</b>
<b>TEXAS, LLC FOR AUTHORITY TO</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>CHANGE RATES</b>	<b>§</b>	<b>OF TEXAS</b>

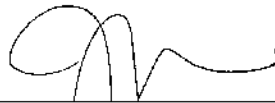
**INTEGRA WATER TEXAS, LLC'S RESPONSE TO  
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

Integra Water Texas, LLC (Integra), files this Response to the First Request for Information (RFI) filed by Commission Staff (Staff). The discovery request was received by Staff on August 25, 2023; therefore, these responses are timely filed. Pursuant to 16 Texas Administrative Code (TAC) § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

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

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**ATTORNEYS FOR INTEGRA WATER  
TEXAS, LLC**

**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 14, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.

A handwritten signature in black ink, appearing to read 'J. Mauldin', is positioned above a horizontal line.

JAMIE L. MAULDIN

**PUC DOCKET NO. 54940**

**INTEGRA'S RESPONSE TO STAFF'S FIRST RFI**

**STAFF 1-1:** Please provide a detailed description and invoices, receipts, or work orders, to support the following assets listed in Integra Water Schedule III-3 Plant in service:

<b>Item No.</b>	<b>Description</b>	<b>Acquired Date</b>	<b>Original Cost (\$)</b>
1	Concrete Pad	10/1/2021	34,309.00
2	Sitework & Grading	10/1/2021	53,370.00
3	Electrical & SCADA	10/1/2021	32,936.00
4	Backup Power with ATS	10/1/2021	35,833.00
5	Sewer Taps	10/1/2021	75,000.00
6	Fence & Gates	10/1/2021	30,115.00
7	WWTP Phase 1 – 80,000 gpd	10/1/2021	1,122,489.00
8	WWTP Phase 1 – 80,000 gpd	10/1/2021	65,136.31
9	Engineering, Permitting	10/1/2021	93,175.45
10	Lift Station	10/1/2021	62,937.00
11	Outfall Line	10/1/2021	3,500.00

- a. Please separate each asset supporting document by the item number.
- b. In a separate Microsoft Excel document, please sum the total amount of each receipt or invoice for each asset to yield the total stated original cost in the following format:

<b>Invoice Date</b>	<b>Invoice #</b>	<b>Description</b>	<b>Amount</b>

- c. Please provide photos of assets as necessary.

**RESPONSE:** For the responsive Microsoft Excel document, please see Attachment Staff 1-1b.

For photos of the invoices, please see Confidential Attachment Staff 1-1c.

Prepared by: Joseph Mitchell

Sponsored by: Joseph Mitchell

Support for 1-1

submitted					Vendor/Invoice	Comments
Item No.	Description	Acquired Date	Original Cost (\$)	Revised Cost		
1	Concrete Pad	10/1/2021	34,309	57,070	DNT #2140-9907	Cost revised based on invoice description
2	Sitework & Grading	10/1/2021	53,370	56,276	DNT #2140-9907; Reuse #07212021-001	Cost revised based on invoice description
3	Electrical & SCADA	10/1/2021	32,936	32,936	A3 #INV-000103; #INV-000104; #INV-000114; #INV-000121; #INV-000129	Category breakout provided by general contractor (A3)
4	Backup Power with ATS	10/1/2021	35,833	20,283	DNT #2140-9918	Cost revised based on invoice description
5	Sewer Taps	10/1/2021	75,000	75,000	Purchase price	No change
6	Fence & Gates	10/1/2021	30,115	30,115	A3 #INV-000103; #INV-000104; #INV-000114; #INV-000121; #INV-000129	Category breakout provided by general contractor (A3)
7	WWTP Phase 1 – 80,000 gpd	10/1/2021	1,122,489	1,120,412	A3 #INV-000103; #INV-000104; #INV-000114; #INV-000121; #INV-000129	Category breakout provided by general contractor (A3)
8	WWTP Phase 1 – 80,000 gpd	10/1/2021	65,136	65,136	A3 #INV-000162	Sales tax on material & equipment
9	Engineering, Permitting	10/1/2021	93,175	85,000	Reuse #RE-02042020-CD; Reuse #RE-02222019-CD	Cost revised based on invoice description
10	Lift Station	10/1/2021	62,937	62,937	A3 #INV-000103; #INV-000104; #INV-000114; #INV-000121; #INV-000129	Category breakout provided by general contractor (A3)
11	Outfall Line	10/1/2021	3,500	10,943	DNT #2140-9918	Cost revised based on invoice description

## List of Invoices

Vendor	Invoice Number	Amount	Item No.
A3	INV-000103	131,200	3, 4, 6, 7, 10
A3	INV-000104	459,200	3, 4, 6, 7, 11
A3	INV-000114	196,800	3, 4, 6, 7, 12
A3	INV-000121	393,600	3, 4, 6, 7, 13
A3	INV-000129	65,600	3, 4, 6, 7, 14
A3	INV-000162	65,136	7
DNT	2140-9907	105,170	1, 2
DNT	2140-9918	31,226	1, 2
Reuse	RE-02222019-CD	84,100	9
Reuse	RE-02042020-CD	900	9
Reuse	07212021-001	8,175	2

**ATTACHMENT STAFF 1-1c**  
**is CONFIDENTIAL**  
**(provided in subsequent filing)**

**PUC DOCKET NO. 54940**

**INTEGRA'S RESPONSE TO STAFF'S FIRST RFI**

**STAFF 1-2:** Please categorize Integra Water "Contract Work" operating expenses in the table and provide the total cost associated with each group. Please sum the totals to yield the stated test year expense.

No.	Description	Amount (\$)
1	Contract Engineering Services (G&A Exp)	\$ 14,444.10
2	Contract Management Fees (Collect Systems-Oper)	2,200.00
3	Contract Management Fees (G&A Exp)	26,752.35
4	Contract Management Fees (Treat & Disposal-Maint)	45,150.00
5	Contract Management Fees (Treat & Disposal-Oper)	33,580.91
6	Other Contract Services (Cust Service Exp)	2,881.34
Total		125,009.01

**RESPONSE:** Please see the table above.

Prepared by: Megan Kirkland  
Sponsored by: Megan Kirkland

**INTEGRA'S RESPONSE TO STAFF'S FIRST RFI**

**STAFF 1-3:** Please list and provide justification for any "Contract Work" expenses included in the table above, which Integra Water did not provide supporting documentation for.

**RESPONSE:** Please see Confidential Application at pages 55-147 for a list of "Contract Work" expenses.

Integra does not have any employees in Texas. It therefore relies on third-party contractors to conduct day-to-day operations in Texas. These operations include daily sampling required by Texas Commission for Environmental Quality (TCEQ) compliance. As such, the Contract Work is necessary for Integra to provide continuous and adequate service in accordance with Commission and TCEQ rules.

Prepared by: Sean McMillan  
Sponsored by: Sean McMillan



**INTEGRA'S RESPONSE TO STAFF'S FIRST RFI**

**STAFF 1-4:** Please provide a copy of Integra's water plant insurance policy and show allocation percentages for affiliates, if any.

**RESPONSE:** Please see Confidential Attachment Staff 1-4.

Prepared by: Joseph Mitchell

Sponsored by: Joseph Mitchell

**ATTACHMENT STAFF 1-4**  
**is CONFIDENTIAL**  
**(provided in subsequent filing)**

The following files are not convertible:

Attachment Staff 1-1b.xlsx

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

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.