

## **Filing Receipt**

Filing Date - 2023-11-21 01:39:35 PM

Control Number - 54940

Item Number - 48

APPLICATION OF INTEGRA WATER \$ BEFORE THE TEXAS, LLC FOR AUTHORITY TO \$ PUBLIC UTILITY COMMISSION OF TEXAS

### INTEGRA WATER TEXAS, LLC'S RESPONSE TO THE OFFICE OF PUBLIC UTILITY COUNSEL'S FIRST REQUEST FOR INFORMATION

Integra Water Texas, LLC (Integra or Company), files this Response to the First Request for Information (RFI) filed by the Office of Public Utility Counsel (OPUC). The discovery request was received by Integra on November 6, 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.

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

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

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

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 November 21, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.

JAMIE I. MAULDIN

#### **INTEGRA'S RESPONSE TO OPUC'S FIRST RFI**

OPUC 1-1: Please clarify whether those costs shown in Schedule II-3, column B, represent a

full year of operation in 2021? If not, please indicate the date operations

commenced.

RESPONSE: Operations fully commenced in October 2021.

#### **INTEGRA'S RESPONSE TO OPUC'S FIRST RFI**

**OPUC 1-2**: With regard to the sludge removal expense in the test year shown in Schedule II-4,

line 1, please provide the breakdown calculations of the \$66,061 cost included in

the test year expense and explain the cost.

RESPONSE: See Confidential Attachment OPUC 1-2.

## Attachment OPUC 1-2 is CONFIDENTIAL

(provided in a subsequent filing)

#### **INTEGRA'S RESPONSE TO OPUC'S FIRST RFI**

OPUC 1-3: Please provide each Bluebonnet Power monthly bill from 2021 through 2023 to

date.

**RESPONSE:** Please see Confidential Attachment OPUC 1-3.

Prepared by: Joseph Mitchell Sponsored by: Joseph Mitchell

# Attachment OPUC 1-3 is CONFIDENTIAL

(provided in a subsequent filing)

#### **INTEGRA'S RESPONSE TO OPUC'S FIRST RFI**

OPUC 1-4: Please explain the cause of the significantly larger bills for power shown in WP II-4 in late 2022 and early 2023.

**RESPONSE:** An increase in Integra's customer count over this period resulted in the power bill amount increase. The table below illustrates Integra's customer increase from January 2022 to October 2023.

<u>Period</u>	<u>Amount</u>					
Jan-22	747					
Feb-22	901					
Mar-22	848					
Apr-22	891					
May-22	913					
Jun-22	889					
Jul-22	1,016					
Aug-22	1,042					
Sep-22	1,074					
Oct-22	1,149					
Nov-22	1,020					
Dec-22	1,083					
Jan-23	1,299					
Feb-23	1,182					
Mar-23	1,324					
Apr-23	1,142					
May-23	1,360					
Jun-23	1,582					
Jul-23	1,627					
Aug-23	1,351					
Sep-23	1,499					
Oct-23	1,328					

Prepared by: Joseph Mitchell Sponsored by: Joseph Mitchell

#### **INTEGRA'S RESPONSE TO OPUC'S FIRST RFI**

For Regulatory Expense (Other), please provide the costs by provider and by month for 2021 through 2023 to date. **OPUC 1-5**:

**RESPONSE:** See Attachment OPUC 1-5.

#### Aqua-Tech Laboratories, Inc

	лчч	u i ccii i	aboratories, inc	
Jan-2021	\$		-	
Feb-2021	\$		-	
Mar-2021	\$		-	
Apr-2021	\$		-	
May-2021	\$		-	
Jun-2021	\$		-	
Jul-2021	\$		-	
Aug-2021	\$		-	
Sep-2021	\$		-	
Oct-2021	\$		-	
Nov-2021	\$		1,983.63	
Dec-2021	\$		-	
Jan-2022	\$		3,048.04	
Feb-2022	\$		2,356.75	
Mar-2022	\$		1,809.50	
Apr-2022	\$		2,317.75	
May-2022	\$		2,415.75	
Jun-2022	\$		2,432.00	
Jul-2022	\$		2,142.50	
Aug-2022	\$		2,262.25	
Sep-2022	\$		2,530.21	
Oct-2022	\$		2,499.50	
Nov-2022	\$		2,145.50	
Dec-2022	\$		2,624.50	
Jan-2023				
Feb-2023				
Mar-2023				
Apr-2023				
May-2023				
Jun-2023				
Jul-2023				
Aug-2023				
Sep-2023				

Oct-2023

#### **INTEGRA'S RESPONSE TO OPUC'S FIRST RFI**

**OPUC 1-6**: For Contract Work, please provide the costs by provider and by month for 2021

through 2023 to date.

**RESPONSE:** See Attachment OPUC 1-6.

Cloudy Management LLC		Journal Entries		Support Services		Allen Engineering		Southdata Inc		WorldWide Interpreters, Inc	
Jan-2021	\$	-	\$ -	\$	-	\$	-	\$	-	\$	-
Feb-2021	\$	-	\$ -	\$	-	\$	-	\$	-	\$	-
Mar-2021	\$	-	\$ -	\$	-	\$	-	\$	-	\$	-
Apr-2021	\$	-	\$ -	\$	-	\$	-	\$	-	\$	-
May-2021	\$	-	\$ -	\$	-	\$	-	\$	-	\$	-
Jun-2021	\$	-	\$ -	\$	-	\$	-	\$	-	\$	-
Jul-2021	\$	-	\$ 1,923.70	\$	-	\$	-	\$	-	\$	-
Aug-2021	\$	2,000.00	\$ 2,450.00	\$	-	\$	-	\$	-	\$	-
Sep-2021	\$	2,000.00	\$ 10,200.00	\$	-	\$	-	\$	-	\$	-
Oct-2021	\$	6,673.95	\$ 12,000.00	\$	-	\$	-	\$	-	\$	-
Nov-2021	\$	4,795.35	\$ -	\$	-	\$	3,000.00	\$	-	\$	-
Dec-2021	\$	7,250.00	\$ (13,286.85)	\$	2,937.98	\$	4,157.30	\$	59.96	\$	-
Jan-2022	\$	7,110.46	\$ (10,220.92)	\$	4,183.44	\$	1,800.00	\$	75.08	\$	-
Feb-2022	\$	6,050.00	\$ 371.91	\$	1,670.99	\$	750.00	\$	81.38	\$	65.79
Mar-2022	\$	15,058.59	\$ 972.80	\$	1,898.16	\$	3,750.00	\$	83.44	\$	118.68
Apr-2022	\$	6,500.00	\$ 772.8 <b>0</b>	\$	1,388.68	\$	-	\$	93.47	\$	277.35
May-2022	\$	6,500.00	\$ 7 <b>39</b> .22	\$	2,534.78	\$	1,500.00	\$	106.76	\$	-
Jun-2022	\$	7,983.65	\$ 1,139.20	\$	2,019.08	\$	1,950.00	\$	104.28	\$	77.40
Jul-2022	\$	2,000.00	\$ -	\$	2,522.22	\$	900.00	\$	121.56	\$	365.07
Aug-2022	\$	9,063.79	\$ 5,389.20	\$	1,158.62	\$	2,400.00	\$	120.19	\$	118.68
Sep-2022	\$	7,239.20	\$ -	\$	2,030.38	\$	-	\$	123.90	\$	50.31
Oct-2022	\$	16,103.88	\$ (7,239.20)	\$	1,831.00	\$	900.00	\$	130.63	\$	91.59
Nov-2022	\$	-	\$ -	\$	2,810.00	\$	1,200.00	\$	129.66	\$	-
Dec-2022	\$	-	\$ 6,319.82	\$	2,7 <b>0</b> 5.00	\$	-	\$	132.03	\$	414.09
Jan-2023											

Feb-2023 Mar-2023 Apr-2023 May-2023 Jun-2023 Jul-2023 Aug-2023 Sep-2023 Oct-2023