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**SOAH DOCKET NO. 473-24-04314
PUC DOCKET NO. 54940**

**APPLICATION OF INTEGRA WATER § BEFORE THE STATE OFFICE
TEXAS, LLC FOR AUTHORITY TO § OF
CHANGE RATES § ADMINISTRATIVE HEARINGS**

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

Integra Water Texas, LLC (Integra or Company), files this Response to the Second Request for Information (RFI) filed by the Office of Public Utility Counsel (OPUC). The discovery request was received by Integra on December 1, 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,

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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 December 20, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE L. MAULDIN

INTEGRA'S RESPONSE TO OPUC'S SECOND RFI

OPUC 2-1: Please describe the Contract Services functions of each of the following:

- a. Aqua-Tech Laboratories, Inc.
- b. Allen Engineering
- c. Southdata, Inc.
- d. WorldWide Interpreters, Inc.
- e. Cloudy Management, LLC

RESPONSE:

- a. Aqua-Tech Laboratories, Inc. conducts wastewater sampling and testing for compliance.
- b. Allen Engineering performs construction inspections.
- c. Southdata, Inc. provides third-party bill printing and mailing services.
- d. WorldWide Interpreters, Inc. provides interpretation services for customers speaking an alternative language, primarily Spanish.
- e. Cloudy Management, LLC performs general third-party contract operations.

Prepared by: John McDonald

Sponsored by: John McDonald

INTEGRA'S RESPONSE TO OPUC'S SECOND RFI

OPUC 2-2: With regard to the spill and clean-up referenced on Schedule II-4, please answer the following:

- a. Was this a sludge spill?
- b. When did the spill occur?
- c. In what months was the clean-up performed?
- d. What role did Cotton Holdings, Inc. perform in the clean-up?

RESPONSE:

- a. No.
A contractor plugged a sewer line and inadvertently left the plug in place. This backed up the sewer line before the line reached the wastewater treatment plant, resulting in the spill.
- b. The spill occurred in December 2022.
- c. Cotton Holdings, Inc. performed the clean-up on December 22, 2022.
- d. Cotton Holdings, Inc. was the third-party contractor that performed the entirety of the cleanup.

Prepared by: Sean McMillan

Sponsored by: Sean McMillan

INTEGRA'S RESPONSE TO OPUC'S SECOND RFI

OPUC 2-3: Please clarify whether Cloudy Management, LLC is currently performing Contract Services in 2023.

- a. If not, when did Cloudy Management, LLC last perform any contract services for Integra?
- b. If not, what company is now performing sludge removal services for Integra and when did they start servicing Integra?

RESPONSE: Cloudy Management, LLC performed contract work for Integra through November 30, 2023.

- a. November 30, 2023
- b. Integra performs these functions internally but will inevitably rely on outside services to backstop and support internal functions.

Prepared by: John McDonald

Sponsored by: John McDonald

INTEGRA'S RESPONSE TO OPUC'S SECOND RFI

OPUC 2-4: In its response to OPUC RFI 1-4, Integra shows customer counts, by month, materially different from the customer count of 192 shown on Schedule 1-3(b). Please explain the difference and clarify which customer count is correct.

RESPONSE: As noted in the supplemental response to OPUC RFI 1-4, the monthly amounts shown were the power bill totals, not customer counts. At the end of the Test Year (December 2022), there were 192 customers.

Prepared by: Megan Kirkland

Sponsored by: Chris Ekrut

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INTEGRA'S RESPONSE TO OPUC'S SECOND RFI

OPUC 2-5: Referencing Integra's response to OPUC RFIs 1-5 and 1-6, please provide the costs, by provider and by month, for 2023 to date.

RESPONSE: See Attachment OPUC 2-5.

Prepared by: Joseph Mitchell
Sponsored by: Joseph Mitchell

		Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	
(1)	Aqua-Tech Laboratories, Inc	Testing	2,339	3,848	-	2,594	2,274	2,514	-	2,485	2,470
(2)	Cloudy Management LLC	Contract Operations	7,722	-	15,693	8,979	7,389	-	7,389	7,389	7,389
(3)	Indirect payroll allocation	Shared services	1,486	1,565	1,291	1,386	2,245	1,575	1,696	1,668	1,773
(3)	Insurance expense	Property insurance	129	129	129	156	156	156	156	156	156
(4)	Support expense	IT exp, telecom, office exp	786	273	597	403	752	599	463	249	304
(5)	Allen Engineering	Engineer	-	-	-	-	-	-	-	-	-
(6)	Southdata	Processing	144	159	162	223	423	174	306	201	238
(7)	Worldwide Interpreters, Inc	Customer Service	156	-	119	347	273	-	588	147	217