



## **Filing Receipt**

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**Item Number - 1035**

**SOAH DOCKET NO. 473-25-00480.WS  
PUC DOCKET NO. 56665**

<b>APPLICATION OF TEXAS WATER UTILITIES, L.P. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**TEXAS WATER UTILITIES, L.P.'S RESPONSE TO OFFICE OF PUBLIC UTILITY  
COUNSEL'S SEVENTH REQUEST FOR INFORMATION**

To: Office of Public Utility Counsel (OPUC), by and through its attorney of record, Renee Wiersema, 1701 N. Congress Avenue, Suite 9-180, Austin, Texas 78701.

Texas Water Utilities, L.P. (TWU) files its Responses to OPUC's Seventh Request for Information (RFI) to TWU received after 3:00 pm on October 16, 2024. This response is timely filed on or before November 6, 2024, pursuant to SOAH Order No. 2 and 16 Texas Administrative Code (TAC) § 22.144(b)(2). Pursuant to 16 TAC § 22.144(c)(2)(F), TWU agrees and stipulates that all parties may treat the responses as if the answers were filed under oath.

Respectfully submitted,

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/s/ William A. Faulk, III  
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**ATTORNEYS FOR TEXAS WATER  
UTILITIES, L.P.**

**CERTIFICATE OF SERVICE**

I hereby 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 6, 2024, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ William A. Faulk, III

William A. Faulk, III

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**TWU'S RESPONSE TO  
OPUC'S SEVENTH RFI**

**OPUC 7-1** For the following, please refer to the TWU document titled "Attachment Staff 2-2."

- a. For each transaction in the "Expense" accounts costing more than \$10,000, please provide copies of invoices.
- b. Please explain why items with the Invoice Reference of 100623818 and 10063319 have a document date of 4/4/2022 but are included in the 2023 test year.
- c. Please provide copies of invoices for all items assigned the following NARUC numbers:

- |          |          |
|----------|----------|
| 1. 631   | 7. 633.S |
| 2. 631.S | 8. 733   |
| 3. 636   | 9. 675   |
| 4. 636.S | 10. 775  |
| 5. 736   | 11. 731  |
| 6. 633   | 12. 733  |

- d. For each item for which an expense has been charged to NARUC account 631 and 731, please describe the services that were provided.
- e. For each item for which an expense has been charged to NARUC account 633 and 733, please describe the services that were provided.
- f. For each item for which an expense has been charged to NARUC account 636 and 736, please describe the services that were provided.
- g. For items listed in NARUC Account 414 and 414.S:
  - i. Please provide a description each asset that was disposed of.
  - ii. Please provide the NARUC account number of the asset that was disposed of.
  - iii. Please provide the credit entries for the removal of these assets from the asset inventory.
- h. Please refer to NARUC account 428.S. Please describe what each item is for.
- i. Please provide copies of the following invoices. For each invoice, please provide the invoice number reference from "Attachment Staff 2-2."

- |               |               |               |
|---------------|---------------|---------------|
| 1. 1900044212 | 19. 100745804 | 37. 100739675 |
| 2. 1900078976 | 20. 100624350 | 38. 100739717 |

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3. 1900079186	21. 100724902	39. 100739718
4. 1900079753	22. 100724953	40. 100739733
5. 1900079928	23. 100725982	41. 100738639
6. 1200371803	24. 5000041659	42. 100742025
7. 1200189255	25. 5000041705	43. 100742075
8. 1200189262	26. 5000041899	44. 100744737
9. 1200189263	27. 5000041900	45. 100745697
10. 1900044383	28. 1200185529	46. 100745803
11. 1900080815	29. 100625508	47. 100745804
12. 1900080959	30. 100729320	48. 100625492
13. 1900081021	31. 100729360	49. 100625503
14. 1200372685	32. 100729372	50. 100625507
15. 1200190773	33. 100727365	51. 100724016
16. 1200190955	34. 100733969	52. 100728953
17. 1200187072	35. 1900078729	53. 100744752
18. 1200189258	36. 5000042067	54. 100749004

- j. For the following transactions, please explain why the NARUC account number and NARUC description state "purchased water," even though the transaction is reported as part of "Wastewater."

1. 100630022	8. 1900079815
2. 100750648	9. 1900079816
3. 100750668	10. 1900080734
4. 1700001150	11. 1900080735
5. 1700001151	12. 1900080780
6. 1900079812	13. 1900080781
7. 1900079814	

**RESPONSE:** Subpart a. and subparts c. through i. of this question are the subject of a pending an objection.

**TWU'S RESPONSE TO  
OPUC'S SEVENTH RFI**

- b. The invoice reference 100623818 initially went into construction work in progress in April 2022. It was subsequently placed into service in January 2023. The invoice reference 10063319 was not found in "Attachment Staff 2-2."
- j. The referenced transactions were inadvertently assigned to NARUC Account 610 - Purchased Water. Document 100630022 relates to chemical costs allocated to both water and wastewater (Allocated Materials and Supplies GL Account). Document 100750648 relates to travel costs allocated to both water and wastewater (Allocated Other Operating Expenses GL Account). Document 100750668 relates to the installation of pressure gauges at a wastewater plant (Repair and Maintenance GL Account). The other 10 documents relate to TCEQ wastewater permit fees for two acquired systems (TCEQ Fees for Wastewater Permit GL Account).

Prepared by: Alhaj Chaudhry & George Freitag

Sponsored by: Alhaj Chaudhry & George Freitag