

Office of Public Utility Counsel Annual Report for Fiscal Year 2015



Prepared for

Senate Natural Resources and Economic Development Committee

Senate Finance Committee

House Appropriations Committee

House Natural Resources Committee

House State Affairs Committee

Sunset Advisory Commission



OFFICE OF PUBLIC UTILITY COUNSEL
PUBLIC COUNSEL, TONYA BAER

January 2016

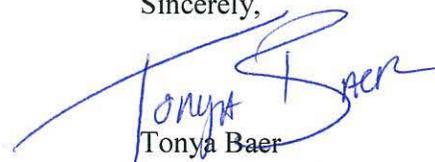
Honorable Members:

The Office of Public Utility Counsel (OPUC) is pleased to submit our *Fiscal Year 2015 Annual Report* as required by the Public Utility Regulatory Act, Section 13.063. This report provides a look at our agency's representation of residential and small commercial utility consumers during Fiscal Year (FY) 2015. Below is a snapshot of our activities this past year:

- attained over \$47.6 million in current year bill savings through consumer representation in 39 contested cases and appeals;
- participated on behalf of residential and small commercial consumers in 16 electric, three telephone, and eight water projects; and
- continued to work with the Public Utility Commission on the transition of water and wastewater regulation.

If you have any questions about this report, please contact me at (512) 936-7549.

Sincerely,


Tonya Baer
Public Counsel

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TABLE OF CONTENTS

SECTION 1: OVERVIEW.....4

SECTION 2: OPUC ORGANIZATION.....5

 OPUC Staff Positions and Type of Work Performed5

 OPUC Hours Billed6

SECTION 3: CONTESTED CASES.....6

 Electric6

 Telecommunications6

 Water and Wastewater7

SECTION 4: PROJECTS AND RULEMAKINGS.....7

SECTION 5: ERCOT AND TEXAS RE PARTICIPATION.....8

SECTION 6: LEGISLATIVE CHANGES9

 OPUC Budgetary Changes9

 Legislation with Consumer Impact.....9

ATTACHMENTS11

 Attachment A: OPUC Calculation of Bill Savings11

 Attachment B: OPUC List of FY 2015 Cases, Projects, and Appeals12

SECTION 1: OVERVIEW

The Office of Public Utility Counsel (OPUC) was created in 1983 as part of the 68th Legislature's Sunset Review of the Public Utility Commission (PUC). The Legislature created OPUC to specifically represent the interests of residential and small commercial utility consumers. While OPUC's responsibilities have varied over the years, OPUC is currently charged with representing residential and small commercial consumers in electric, telecommunications, and water and wastewater matters.

Section 13.063 of the Public Utility Regulatory Act (PURA) requires OPUC to provide an annual report on the agency's activities during the preceding year and to submit the report to the standing legislative committees that have jurisdiction over OPUC and to the Sunset Advisory Commission. The report must include:

- The types of activities conducted by OPUC and time spent by OPUC on each activity;
- The number of hours billed by OPUC representing residential or small commercial consumers in proceedings;
- The number of staff positions and type of work performed by each position; and
- OPUC's rate of success in representing residential and small commercial consumers in appealing Commission decisions.

OPUC participates in various activities each year, such as, contested cases, appeals, rulemakings, projects, and various Electric Reliability Council of Texas (ERCOT) and Texas Reliability Entity (Texas RE) related events.

In contested cases and appeals, OPUC provides legal representation and technical expertise. OPUC staff develops testimony and proposals that benefit residential and small commercial consumers and promotes their interests. In FY 2015, OPUC participated in 39 contested proceedings and appeals and helped consumers realize over \$47.6 million in current year bill savings. Of these 39 proceedings, five were appeals of PUC orders, including three rate cases, one rate case expense case, and one case involving approval of a competitive generation service tariff. All five appeals remain pending, with one at the Texas Supreme Court, three at the Third Court of Appeals, and one in Travis County District Court. Three of the appeals had positive dispositions, one had a negative disposition, and one had no activity in 2015.

Likewise, in rulemakings and projects, OPUC also provides legal representation and technical expertise to benefit and promote consumer interests. In FY 2015, OPUC participated in 27 projects consisting of 16 electric, three telecommunications, and eight water and wastewater projects.

Along with representing consumer interests in cases and appeals, OPUC is also an active participant at ERCOT, which is the Independent System Operator (ISO) for 90 percent of the Texas electric grid. The Public Counsel is an ex officio voting member of the ERCOT Board of Directors and serves on the Human Resources and Governance Committee. OPUC staff also participates at the technical committee level. OPUC staff serves on the Technical Advisory Committee (TAC) as well as on several other ERCOT committees and working groups.

In addition to serving on the ERCOT Board, the Public Counsel is also an ex officio member of the Texas Reliability Entity (Texas RE). Texas RE is responsible for ensuring compliance with the North American Electric Reliability Corporation (NERC) reliability standards within the geographic boundaries of the ERCOT region.

As well as representing residential and small commercial consumers in regulatory matters, OPUC also works with various community organizations, state and local agencies, stakeholders, and individual consumers to provide information on utility matters. During FY 2015, OPUC provided information to consumers through several media outlets, such as Facebook, Twitter, and Consumer Alert emails. Further, OPUC handles consumer complaints and inquiries through its toll-free number and works with the PUC, TCEQ, and market participants to resolve consumer concerns. In FY 2015 alone, OPUC staff handled over 270 consumer complaints.

OPUC also responds to requests from the Texas Legislature for information on impacts of proposed legislation to residential and small commercial consumers. During the 84th Legislature, OPUC was asked to provide information on such topics as streamlining ratemaking for non-ERCOT utilities, eliminating the System Benefit Fund (SBF), and water and wastewater rate regulation.

SECTION 2: OPUC ORGANIZATION

OPUC Staff Positions and Type of Work Performed

OPUC is headed by the Public Counsel, who is appointed by the Governor and confirmed by the Senate for a two-year term. The Public Counsel must be licensed to practice law in the state of Texas and must be a Texas resident. The ninth and current Public Counsel is Tonya Baer, appointed by Governor Rick Perry on October 10, 2013 and reappointed by Governor Greg Abbott on February 4, 2015, and subsequently confirmed by the Texas Senate.

The Public Counsel supervises the overall operations of the agency and establishes agency policy. Specifically, the Public Counsel is responsible for the agency budget, staffing, selection of rulemakings in which to participate, and the selection of cases in which to intervene.

OPUC currently has nineteen employees. The Deputy Public Counsel, who reports directly to the Public Counsel, oversees both legal and technical staff and serves as head of the agency in the Public Counsel absence. The Director of Administration, who also reports to the Public Counsel, oversees the administrative support staff and the day-to-day business and financial operations of the agency. Likewise, reporting to the Public Counsel is the agency's Procurement and Contract Specialist. Also reporting to the Public Counsel is the Director of External Relations, who oversees communication specialist staff, and a Senior Market Specialist who between the two of them handle interagency and stakeholder communications, legislative and intergovernmental relations, and various ERCOT activities.

The agency’s staff consists mostly of attorneys and experts in the fields of finance and economics. Staff represents residential and small commercial consumers in both litigated and non-litigated matters before state and federal regulatory agencies and courts. Major areas of work include contested cases such as rate cases, fuel reconciliation, energy efficiency cases, and advanced metering deployment reconciliation proceedings. Non-litigated matters include rulemakings, projects, and workshops in which OPUC appears before different regulatory entities to represent consumers and to safeguard consumer interests.

OPUC Hours Billed

OPUC’s workload during FY 2015 consisted of electric, telecommunications, and water and wastewater cases, projects, and appeals. Below is a chart summarizing OPUC staff hours spent on these various activities as well as total staff hours for FY 2015.

	Total Cases	Total Projects	Total Appeals	Total Hours
OPUC Staff Hours	11,910.0	7,266.0	821.5	19,997.5

Table 1: Hours Billed

SECTION 3: CONTESTED CASES

In FY 2015, OPUC participated in 26 contested electric cases, three contested telecommunications cases, five contested water and wastewater cases and five appeals. These cases include traditional rate cases, fuel factors, reconciliation proceedings, and energy efficiency cost recovery cases. For more information, see Attachment B, *OPUC List of FY 2015 Cases and Projects*.

Electric

In FY 2015, a significant portion of the agency’s resources were devoted to determining reasonable rates for integrated utilities in regulated areas. Most of the agency’s employees are involved in negotiating and litigating these large rate cases. Issues in these rate cases typically include a company’s return on equity, costs of service, taxes, affiliate transactions, cost allocation, and rate design. Each issue may involve expert testimony from accountants, engineers, economists, or other industry experts. OPUC’s efforts in negotiating and litigating these rate cases have resulted in lowering costs to residential and small commercial consumers by over \$47.6 million in current year bill savings.

Telecommunications

In FY 2015, OPUC participated in three telecommunications cases involving the Texas Universal Service Fund (USF). Telecommunications companies receive financial support from the Texas USF to help provide service to customers. These cases involved rate rebalancing

related to reductions in support from the Texas USF, specifically the Texas High Cost Universal Service Plan (THCUSP). Telecommunications companies may change rates for basic local service consistent with reductions in support from the THCUSP. Additionally, companies are required to offset any increases in basic local telecommunications service by an additional 25 percent increase in the low-income discount. OPUC participated in these telecommunications cases to ensure that all eligible low-income consumers received the additional discount and to confirm the requested rate rebalancing was limited to the proportional amount in reduced support from the THCUSP. Reductions in support from the Texas USF contribute to lower USF charges on consumers' bills.

Water and Wastewater

OPUC began intervening in water and wastewater rate cases in September 2013 pursuant to the authority granted in Senate Bill 567 and House Bill 1600. During that fiscal year, the water and sewer rate cases remained under TCEQ's jurisdiction and were conducted pursuant to the TCEQ's procedural rules. On September 1, 2014, water and wastewater rate regulation was transferred to the PUC, and OPUC has continued its representation of consumers in cases before the PUC.

To affect the transfer from TCEQ to PUC, the PUC has conducted at least nine projects including rulemakings and form revisions. OPUC actively participated in these projects by providing comments, to ensure that residential and small commercial consumers had a voice in the process.

Since receiving authority to intervene in water and wastewater cases, OPUC has intervened in five separate water and wastewater rate cases for utilities ranging in size from around 1,400 customers to nearly 25,000 customers (compared to electric cases which can involve millions of customers). OPUC has achieved significant benefits for consumers in the cases that have settled this far. These benefits include a waiver of rate case expenses and agreements on the part of the utilities not to seek additional rate increases for a set time (i.e. rate freezes) ranging up to five years from the settlement date and reductions in proposed rate increases. A final case was dismissed by the PUC, at OPUC's urgency, for failing to comply with statutory filing requirements.

SECTION 4: PROJECTS AND RULEMAKINGS

In FY 2015, OPUC actively participated and advocated for consumers in 27 projects and rulemakings – 16 electric, three telecommunications, and eight water and wastewater. OPUC analyzed issues, made recommendations, filed comments and reply comments, attended workshops, public hearings, and meetings with industry stakeholders in order to effectively represent the interests of its clients. The scope of these projects and rulemakings encompassed such issues as water and wastewater rate making, rate filing package requirements, and the Universal Service Fund.

SECTION 5: ERCOT AND TEXAS RE PARTICIPATION

As noted in Section 1 of the Report, OPUC is an active participant at both ERCOT and the Texas RE. The Public Counsel is an ex officio, voting member of the ERCOT Board of Directors, and an ex officio, non-voting member of the Texas RE Board of Directors. In both capacities, the Public Counsel represents the interests of residential and small commercial consumers.

In addition to the Public Counsel's involvement at the Board of Directors level, the Public Counsel also appoints two individuals to represent residential consumers on ERCOT's Technical Advisory Committee (TAC) and TAC subcommittees. TAC comprises representatives from all market segments and is tasked with evaluating reliability and market issues and making appropriate recommendations to the ERCOT Board of Directors. The TAC subcommittees are: the Retail Market Subcommittee (RMS), which serves as a forum for issue resolution regarding retail market matters affecting ERCOT and ERCOT Protocols; the Wholesale Market Subcommittee (WMS), which evaluates wholesale market issues; the Protocol Revision Subcommittee (PRS), which has responsibility for facilitating changes to the ERCOT Protocols; the Commercial Operations Subcommittee (COPS), which addresses the ERCOT market data processes; and the Reliability Operations Subcommittee (ROS), which evaluates issues related to the reliable operation of the ERCOT system.

OPUC's involvement at the Board of Directors, TAC, and TAC subcommittee levels ensures that residential consumers are represented throughout the stakeholder process. Over the past year, OPUC has been active in the Distributed Energy and Ancillaries Market Task Force (DREAM TF). The task force is focused on how to bring smaller resources, such as distributed generation under 10 MW and energy storage, the financial incentives needed to come online during times of congestion or scarcity and provide ERCOT a means to map where these resources exist so they may be accounted for in the dispatch process. The Task Force's discussion around metering for these resources, as well as the potential to aggregate smaller consumers into a larger generation resource, is an area that OPUC has focused on.

Another key issue for consumers at ERCOT has been how to incorporate demand response for residential consumers and how to aggregate distributed generation for these consumers. OPUC is participating in these meetings and has provided input to ensure that customer protections that are in place in the retail electric market will be considered for demand response and distributed generation customers.

SECTION 6: LEGISLATIVE CHANGES

OPUC Budgetary Changes

Following the 83rd Regular Session, OPUC's statutory responsibilities were expanded to include representation of residential and small commercial consumers of water and wastewater services.

During FY 2015, the Legislative Budget Board and the Governor's Office of Budget, Planning and Policy approved a revised budget structure and performance measures for the 2016-2017 biennium. The revised budget structure and performance measures are based on the functions performed by OPUC rather than by utility type to better reflect the agency's expanded workload and the agency's leveraging of resources to efficiently carry out its statutory responsibilities. Further, OPUC's performance measure targets have been increased to reflect the agency's expanded responsibilities regarding water and wastewater consumer representation.

Legislation with Consumer Impact

The 84th Texas Legislature passed several bills that impact consumers. First, House Bill (HB) 7 by Representative Darby and HB 1101 by Representative Turner made changes to the system benefit fund (SBF) low-income discount set by the Public Utility Commission (PUC). In 2013, the Legislature ended the collection of the fee to fund the discount and established discount rates at amounts intended to exhaust the remainder of the fund by September 1, 2016. However, with milder temperatures, lower rates, and lower program participation, the balances in the fund are not expected to be exhausted by September 1, 2016. Therefore, both HB 7 and HB 1101 were passed and signed by the Governor to address the issue. Both bills remove the limit on the discount amount and the requirement that the discount only be applied in certain months. While both bills require the PUC to set a discount rate necessary to exhaust the fund, HB 1101 added a safeguard to address the potential of lower participation and milder temperatures that may leave additional monies in the fund at the end of August 2016. The provision says that if any monies remain in the fund on September 1, 2016 then the PUC is directed to use the remainder of the funds for a program to provide a discount to low-income customers from September 2016 through August 2017.

Second, HB 706 by Representative Farrar simplified the process for claiming a property tax exemption for solar or wind devices on a home. Under the bill, an owner is only required to claim the exemption once, the year in which the device is installed.

Third, HB 939 by Representative Dale prohibits property owners' associations (POA) from forbidding a home owner from installing a standby electric generator. However, POAs are allowed to set requirements for the installation and maintenance of these generators consistent with municipal zoning ordinances and health, safety, electrical, and building codes. These restrictions can include screening the generator if it is visible from the street or in an unenclosed backyard as well as prohibiting these generators from being placed on property owned by the POA or in common areas. However, if any of these restrictions add more than 10 percent to the

cost of installing the generator or more than 20 percent to the cost of installing and connecting the electrical and fuel lines of the generator, then the restrictions are not enforceable.

Finally, Senate Bill 1626 by Senator Jose Rodriguez forbids developers, in developing residential subdivisions, with planned units greater than 50, from prohibiting property owners from installing a solar energy device.

Attachment A
OPUC Calculation of Bill Savings

The methodology that OPUC uses to determine *current* year bill savings was developed by the agency in conjunction with the State Auditor's Office and approved by the Legislative Budget Board (LBB). It is reported as part of OPUC's performance measures.

Current Year Bill Savings are calculated as the difference between a requested amount for a rate adjustment and the amount actually approved, multiplied by a percentage representing residential and small commercial customer contribution to the revenues generated by the rates. Because some of the bill savings go to classes other than the residential and small commercial classes, OPUC takes only a percentage of the difference between the requested rates and the rates actually received. The percentage is calculated by determining the percentage of revenue that residential and small commercial customers provide in Texas to all electric utilities based upon a three-year rolling average (using Department of Energy publicly available data). Although bill savings typically exist year after year (for example, until the next rate case is filed), OPUC calculates and reports only one year's worth of savings. OPUC's current year bill savings for FY 2015 was \$47,677,541.67.

Attachment B
OPUC List of FY 2015 Cases, Projects and Appeals

Electric-Cases

- 42004 Southwestern Public Service Company Application for Authority to Change Rates & to Reconcile Fuel & Purchased Power Costs for the Period July 1, 2012 through June 30, 2013
- 42370 Southwestern Electric Power Company Application for Rate Case Expenses Severed From PUC Docket No. 40443
- 42454 Southwestern Public Service Company Application to Adjust Its Energy Efficiency Cost Recovery Factor
- 42469 Lone Star Transmission, LLC Application for Authority to Change Rates
- 42730 Entergy Texas, Inc. Application to Implement an Interim Fuel Refund Net of Bandwidth Calculation Payments
- 42787 Southwestern Public Service Company Application for Authority to Implement a Surcharge to Recover Under-Collected Fuel Cost
- 43111 Entergy Texas, Inc. Application for Approval of a Distribution Cost Recovery Factor
- 43127 CenterPoint Energy Houston Electric, LLC Compliance Filing for a Standard True-Up of System Restoration Charges Under Schedule SRC
- 43128 CenterPoint Energy Houston Electric, LLC Compliance Filing for a Standard True-Up of ADFIT Credit Charges Under Schedule ADFITC
- 43239 Texas-New Mexico Power Company Application for Amendment to its Commission-Approved AMS Deployment Plan
- 43347 City of Garland Application to Change Rates for Wholesale Transmission Service
- 43361 Southwestern Electric Public Service Application for Approval of Final True Up of its Transmission Cost Recovery Factor & Associated Refund
- 43695 Southwestern Public Service Company Application for Authority to Change Rates
- 43839 AEP Texas North Company Petition for Administrative Approval of Transmission Cost Recovery Factor
- 43840 AEP Texas Central Company Petition for Administrative Approval of Transmission Cost Recovery Factor
- 43950 Cross Texas Transmission, LLC Application for Authority to Change Rates & Tariffs
- 43958 Entergy Texas, Inc. Application for Approval of an Amendment to Certificate of Convenience & Necessity & for Public Interest Determination for Purchase of Unit 1, Union Power Station
- 44289 Southwestern Public Service Company Application for Authority to Implement Surcharge Associated with Docket No. 42004
- 44361 Sharyland Utilities, L.P. Application for Approval of an Advanced Metering System Deployment Plan, Surcharge, and Non-Standard Metering Service Fees
- 44572 CenterPoint Energy Houston Electric, LLC Application for Approval of a Distribution Cost Recovery Factor Pursuant to P.U.C. Subst. R. 25.243
- 44620 Sharyland Utilities, L.P. Application to Revise its TCRF Class Allocation Factors and Request For Good Cause Exception From PUC Subst. R. §25.193(c)
- 44698 Southwestern Public Service Company Application to Adjust Its Energy Efficiency Cost Recovery Factor
- 44704 Entergy Texas Inc. Application for Authority to Change Rates
- 44746 Wind Energy Transmission Texas, LLC Application for Authority to Changes Rates and Tariffs
- 44785 Sharyland Utilities, L.P. Petition for Approval of Transmission Cost Recovery Factor Update
- 44941 El Paso Electric Company Application to Change Rates

Electric-Projects

- 36234-P Joint TDUs AMS Low-Income Programs Project
- 38578-P Energy Efficiency Implementation Project Under Subst. R. §25.181(q)
- 39547-P Project to Revise Rate Filing Package for Vertically Integrated Utilities
- 39548-P Project to Revise Rate Filing Package for Investor Owned Transmission & Distribution Utilities
- 41061-P Rulemaking Regarding Demand Response in the Electric Reliability Council of Texas (ERCOT) Market
- 42330-P PUC Rulemaking Proceeding to Propose New Procedural Rule 22.146, Relating to Limitations on Discovery in Rate Proceedings
- 42740-P PUC Rulemaking Proceeding to Amend Substantive Rule 25.101, Relating to Certification Criteria
- 42786-P Review of Advance Metering System Web Portals
- OPUC 02-2 ERCOT Activities
- OPUC 07-1 OPUC's Project Number for Customer Complaints
- OPUC 09-3 Customer & External Communications Activities
- OPUC 10-5 Texas Reliability Entity (Texas RE) Activities
- OPUC 11-2 OPUC's Project Number for Participation in Various CCN Proceedings
- OPUC 11-3 OPUC's Project Number for Military Communications & Assistance
- OPUC 14-2 EFH Bankruptcy
- OPUC 15-1 OPUC Response to Sharyland Utilities, L.P. Issues

Electric-Courts

- 35717 Application of Oncor Electric Delivery Company LLC for Authority to Change Rates
[D-1-GN-10-000448]
[03-11-00072-CV]
[15-0005]
- 38951 Application of Entergy Texas, Inc. for Approval of Competitive Generation Service Tariff
(Issues Severed from Docket No. 37744)
[D-1-GN-13-003434]
[03-14-00709-CV]
- 39896 Application of Entergy Texas, Inc. for Authority To Change Rates, Reconcile Fuel Costs, and Obtain Deferred Accounting Treatment
[D-1-GN-13-000179]
[D-1-GN-13-000121]
[D-1-GN-12-003721]
[D-1-GV-13-000045]
[D-1-GN-13-000221]
[03-14-00735-CV]
- 40295 Application of Entergy Texas, Inc. for Rate Case Expenses Pertaining to PUC Docket No. 39896
[D-1-GN-13-002623]
[03-14-00706-CV]

- 40443 Application of Southwestern Electric Power Company For Authority to Change Rates and Reconcile Fuel Costs
[D-1-GV-14-000612]
[D-1-GV-14-000536]
[D-1-GN-14-001378]
[D-1-GN-14-001373]

Telephone – Cases

- 43834 Central Telephone Company of Texas DBA CenturyLink Application to Revise Its Local Residential Rates Pursuant to Subst. R. §26.207 & 26.208
- 43835 United Telephone Company of Texas DBA CenturyLink Application to Revise Its Local Residential Rates Pursuant to Subst. R. §26.207 & 26.208
- 43853 GTE Southwest Incorporated DBA Verizon Southwest Application to Revise Its Local Residential Rates

Telephone – Projects

- 40342-P PUC Rulemaking Proceeding to Amend Subst. R. §26.403 Relating to the Texas High Cost Universal Service Plan
- 41608-P Rulemaking to Amend Substantive Rules to Telecommunications to Conform to PURA §56.023
- 42477-P PUC Rulemaking to Amend Chapter 26, P.U.C. Substantive Rules to Implement Certain Sections of S.B. 259, 83rd Legislative Regular Session

Water – Cases

- 42802 Monarch Utilities I, L.P. Application for a Change in Water & Sewer Rates & Tariffs for Certificate of Convenience & Necessity (CCN) Nos. 12983 & 20899; Application No. 37714
- 42839 SWWC, Inc. DBA Hornsby Bend Utility Company Application for Water Rate/Tariff Changes for Certificate of Convenience & Necessity (CCN) No. 11978, & Sewer Rate/Tariff Changes in CCN No. 20650, in Travis County; Applications Nos. 37716-R and 37717-R
- 42858 SJWTX, Inc. DBA Canyon Lake Water Service Company Application for a Water Rate/Tariff Change, Certificate of Convenience & Necessity No. 10692, Blanco and Comal Counties; Application No. 37746
- 42859 Suburban Utility Company Application for a Water Rate/Tariff Change for Certificate of Convenience & Necessity (CCN) No. 10835 in Harris County; Application No. 37711
- 44681 Compliance Docket Related to Refunds From Docket No. 42859

Water – Projects

- 43871-P PUC Rulemaking Proceeding to Amend Chapter 24 for the Implementation of Phase II of the Economic Regulation of Water & Sewer Utilities
- 43876-P PUC Form Revisions for Phase II of the Implementation of HB 1600 Regarding the Economic Regulation of Water & Sewer Utilities
- 43967-P PUC Form Revisions for Phase II of the Implementation of the Economic Regulation of Water & Sewer Utilities (Rate Filing Package Pursuant to TWC §13.1871)
- 43968-P PUC Form Revisions for Phase II of the Implementation of the Economic Regulation of Water and Sewer Utilities (Additional Water Forms)
- 43969-P PUC Rulemaking Project to Amend Chapter 22 for the Implementation of Phase II of the Economic Regulation of Water & Sewer Utilities

- 44462-P PUC Forms Revisions for Phase II of the Implementation of the Economic Regulation of Water and Sewer Utilities (Rate Filing Package Pursuant to TWC 13.1872)
- 44706-P PUC Project Regarding Annual Report Forms and Forms for Notice of Application to Change Rates for Water and Sewer Utilities
- OPUC 14-1 OPUC generic project number for water-related activities