



GUAM WATERWORKS AUTHORITY

December 3, 2021

Joephet R. Alcantara, Esq.
Administrative Law Judge
Guam Public Utilities Commission and
Thompson Thompson & Alcantara, P.C.
238 Archbishop Flores Street, Suite 801
Hagåtña, Guam 96910

Subject: ALJ Order After Hearing – Requested Submittal (GWA Docket 19-08)

Hafa Adai ALJ Alcantara:

As ordered in the *Order After Hearing* for GWA Docket 19-08 (November 22, 2021), GWA herewith submits the requested testimony and documentation in support of the GWA Modified Rate Proposal (“Updated Rate Plan”) presented in rebuttal to both the Guam Public Utilities Commission (GPUC) consultant testimony, and the Navy intervenor testimony presented at the evidentiary hearings for this Docket conducted on November 9, 2021. GWA also re-submits the supporting documentation provided on November 9th to complete the requirements listed in item 1 of your Order.

As stated at the evidentiary hearing, and reiterated at the ALJ conference with Counsels on November 24th, contrary to GPUC consultants claims, GWA has not introduced any information that was not already in the substantial and exhaustive record of evidence in this proceeding. GWA does not believe that additional requests for information (RFIs) will add anything of substance to the record, and accordingly respectfully requests that the *Order After Hearing* be amended to truncate additional discovery. We note that GPUC consultants have been allowed four sets of RFIs on the evidence in the record. As discussed in submitted testimony, we have provided 7 simple, responsive updates using data in the record. By limiting, or preferably foregoing, additional redundant discovery, an amended order could still allow for adequate time for the ALJ’s consideration of GWA’s Modified Rate Proposal in the adjudication of this Docket in calendar year 2021.

If the ALJ’s *Order After Hearing* is to stand, GWA will respond to RFIs submitted in accordance with the order, referencing again information already in the record. However, we object to the GPUC consultants November 26th memo regarding that order and any assessment of adequacy that has been offered. It is clear to GWA from the extraordinary pattern of claims, demands and

outrage from the GPUC consultant over the past three years, that there will be no acknowledgment from the GPUC Consultants that the record in this Rate Case is sufficient where they are well-served by extending their work on this Docket as long as possible.

GWA has presented a Updated Rate Plan developed appropriately from version 1.4 of the Rate Application Model (RAM) requested by the ALJ, based on information that has been available for sufficient vetting by all parties, and that represents a reasonable and just compromise that considers our initial May 1st filing and the GPUC consultant/Navy Intervenor positions and incorporates available federal relief funding (which had not been confirmed as of our May 1, 2021 filing), reasonable expense/revenue adjustments, and prudently considers impacts outside of the FY2022 – FY2024 period. No reasonable or just alternatives or adjustments have been forthcoming from the GPUC Consultants.

If the ALJ intends to present different outcomes or considerations to the Commission, alternative scenarios may be developed that adjust (1) the prudent timing and amounts of rate stabilization funds for FY2022 through FY2025, (2) revenue requirements, (3) Customer Assistance Program amounts, and/or (4) updated water demand forecasts.¹ Notably, to ensure accuracy, these must be made through appropriate adjustments to the Rate Application Model (RAM). If such is the ALJ’s intent, GWA is willing to incorporate RAM adjustments dictated by the ALJ to develop an alternative rate scenario. This would involve a mechanical exercise of employing revised inputs in the RAM and cannot invite further rounds of expensive and time-consuming discovery, review and commentary.

The following table lists the attached documents that are responsive to your order.

Item	Description	Type
1	Testimony of Miguel C. Bordallo, P.E.	PDF
2	Testimony of Eric P. Rothstein with Exhibits	PDF
3	Testimony of Christopher Budasi	PDF
4	Testimony of Thomas Chestnutt with Exhibit	PDF
5	Supporting Document: Day 2 Presentation Evidentiary Hearing	PDF
6	Supporting Document: Staff Exhibit 1 – Adjustment Analysis 102021_7pm+EPR	Excel file
7	Supporting Document: GWA Modification – Listing of Revisions and Source Availability	PDF
8	Rate Application Model: GWA Modified Proposal RAM FINAL	Excel file
9	Supporting Document: Filing Schedules from GWA Modified Rate Proposal	PDF

¹ That reflect information observed in FY 2021

Should you have any questions or concerns, please do not hesitate to contact us.

Best regards,



MIGUEL C. BORDALLO, P.E.

General Manager

Attachments

xc: Jeff Johnson, Chairman – Guam Public Utilities Commission
Tim Roberts, Counsel to Georgetown Consulting Group, Inc.
John V.R. Aguon, Counsel, NAVFAC Marianas
Christopher R Odoca, Assistant Counsel, NAVFAC Marianas
Larry Allen, NAVFAC HQ
Kelly Clark, General Counsel, Guam Waterworks Authority
Theresa G. Rojas, General Counsel, Guam Waterworks Authority
Taling Taitano, Chief Financial Officer, Guam Waterworks Authority
Gilda Mafnas, Deputy Chief Financial Officer, Guam Waterworks Authority
Christopher Budasi, AGM-A/S, Guam Waterworks Authority
Eric Rothstein, Galardi Rothstein Group
Cody Stanger, Galardi Rothstein Group
Jamshed Madan, Georgetown Consulting Group, Inc.
Larry Gawlik, Georgetown Consulting Group, Inc.
Dan Stathos, Georgetown Consulting Group, Inc.
Robert Young, Georgetown Consulting Group, Inc.
Bill Norris, , Georgetown Consulting Group, Inc.