

GUAM WATERWORKS AUTHORITY

Guam Public Utilities Commission
GWA Docket 19-08



Second Data Request of The Department of the Navy to Guam Waterworks Authority

<u>Item No.</u>	<u>Description</u>
1.	Please provide an impact analysis for all Navy wastewater accounts with GWA in Excel spreadsheet format with all formulas intact. The impact analysis should include total annual costs for each account at both current rates and proposed rates and also identify the wastewater volumes used in the impact analysis.
2.	Please provide an impact analysis for all Andersen Air Force Base wastewater accounts with GWA in Excel spreadsheet format with all formulas intact. The impact analysis should include total annual costs for each account at both current rates and proposed rates and also identify the wastewater volumes used in the impact analysis.

The Department of the Navy (Navy) notes there are a couple of outstanding issues related to its First Data Request, submitted on May 20, 2021. First, the Navy has not yet received responses to Item Nos. 5¹ and 6² from its First Data Request from GWA, which, pursuant to the June 9, 2021 Order Granting Petition to Intervene, had until two weeks from the date of that Order to respond. The Navy respectfully requests GWA provide responses to these items, without further delay. Second, models that have been provided by GWA to the Navy are password protected, restricting the Navy's ability to fully access the data. The Navy respectfully requests

¹ Please provide dates and times of your availability to engage in telephone or web-conference discussions to review, clarify, or provide training on GWA's RAM.

² To the extent not already provided, please provide the Rate Application Schedules (Schedule A-1 through Schedule L) in executable native format with all formulas intact.

GUAM WATERWORKS AUTHORITY

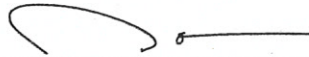
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GWA provide the requisite passwords or models that are fully accessible.

Respectfully submitted this 7th day of July, 2021.



Christopher R. Odoca
Assistant Counsel, NAVFAC Marianas

BEFORE THE PUBLIC UTILITIES COMMISSION OF GUAM



**IN RE: PETITION FOR APPROVAL OF
GWA'S THIRD FIVE-YEAR FINANCIAL
PLAN (BASE RATE INCREASES)**

GWA DOCKET 19-08

CERTIFICATE OF SERVICE

I hereby certify, pursuant to Rule 4, that on 07 July 2021, I caused service of eight copies of the Department of the Navy's "Second Data Request of the Department of the Navy to Guam Waterworks Authority" and this "Certificate of Service" by hand delivery to the Public Utilities Commission of Guam:

Public Utilities Commission of Guam
Suite 207, GCIC Building
414 West Soledad Avenue
Hagatna, GU 96910

Additional copies were served by hand delivery on 07 July 2021 to:

Kelly O. Clark
GWA Legal Counsel
Guam Waterworks Authority
Gloria B. Nelson Public Service Building, Mangilao, Guam 96913

Tim Roberts
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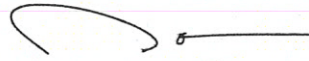
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Additional copies were served by email on 07 July 2021 to:

Dr. Kay Davoodi & Larry Allen
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khojasteh.davoodi@navy.mil
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Dated this 7th day of July 2021.



Christopher R. Odoca
Assistant Counsel, NAVFAC Marianas