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PUBLIC COMMENT

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APPLICATION OF AQUA TEXAS, INC. FOR AUTHORITY TO CHANGE RATES

To the Honorable Commissioners:

I am an Aqua Texas customer on the Spring West Water system (PWSID TX1013103, CCN 13203) in Cypress, Texas. I filed a comment in this docket on April 20, 2026 (Item 4561). This comment corrects that filing and responds to the Administrative Law Judges' September 21, 2026 letter (Item 4905).

Revised Finding of Fact No. 169 states that Aqua's proposed rate design includes adjustments intended to mitigate customer rate shock at higher usage levels and, in general, shifts cost recovery away from fixed charges toward volumetric charges, with specific effects that vary by rate zone. On the Spring West system, where interim rates reflecting Aqua's proposed rates have been billed since March 9, 2026, the largest increases fall at higher usage levels.

Computed from the charges printed on Spring West statements, the monthly bill for the same amount of water under the prior tariff and under interim rates is:

Monthly water use	5/8" meter: before	5/8" meter: now	Change	1" meter: before	1" meter: now	Change
5,000 gallons	\$137.96	\$172.22	+25%	\$198.01	\$324.09	+64%
10,000 gallons	\$171.79	\$257.07	+50%	\$231.84	\$408.94	+76%
15,000 gallons	\$205.63	\$369.64	+80%	\$265.67	\$521.51	+96%
20,000 gallons	\$239.46	\$482.21	+101%	\$299.52	\$634.09	+112%

The increase grows with every gallon: on a 5/8-inch meter, from 25 percent at 5,000 gallons to 101 percent at 20,000 gallons; on a 1-inch meter, from 64 percent to 112 percent.

The part of the increase that grows with usage comes from two changes. Water usage moved from a flat \$3.70 per 1,000 gallons to four increasing tiers beginning at \$5.488. Sewer service, previously billed only as flat monthly charges, is now also billed at \$5.25 per 1,000 gallons on 100 percent of metered water, with no winter averaging and no deduction for water that does not enter the sanitary sewer.

The effect on fixed charges depends on meter size. Immediately before interim rates, fixed monthly charges on a 5/8-inch meter totaled \$107.69: a \$31.00 water customer charge, a \$63.80 sewer customer charge, and system improvement charges of \$3.69 and \$9.20. Under interim rates they total \$100.21, a decrease of \$7.48. On a 1-inch meter, fixed monthly charges rose from \$169.73 (\$87.50, \$63.80, \$9.23 and \$9.20) to \$250.58, an increase of \$80.85, or 48 percent, driven by a sewer customer charge that rose from \$63.80 to \$163.28.

I respectfully ask the Commission to consider:

1. Whether billing sewer usage on all metered water, without winter averaging or any comparable adjustment, is consistent with a rate design that Finding of Fact No. 169 describes as intended to mitigate customer rate shock at higher usage levels.
2. That Finding of Fact No. 169 not be read to mean that fixed charges decreased for customers whose fixed charges increased, such as 1-inch meter customers on the Spring West system.
3. How the recommended single statewide tariff is reconciled with Preliminary Order Issue No. 57, which asks whether it is practicable to consolidate rates by region.

Correction to my April 20, 2026 comment. The 93.8 percent sewer ratio I reported on April bills was a billing-period proration, not an irrigation allowance. On full-month bills, sewer is billed on 100 percent of metered water. The April usage for household H-009 was 27,800 gallons, not 26,000.

Data. All figures are computed from 453 Aqua billing statements from 57 Spring West households, April 2024 through September 2026, transcribed line by line and checked against each statement's printed total. The prior fixed charges above appear on all 102 prior-tariff statements dated February and March 2026, and the interim customer charges appear on all 114 full-month interim-rate statements. The table applies the charges printed on those statements, including the regulatory assessment fee, and holds the Regional Pass-Through Gallonage Charge, which passes through fees Aqua pays to water authorities, districts, and outside water suppliers, at its current rate of \$3.3213 per 1,000 gallons in both columns so that only Aqua's water and sewer charges differ. Rounding each line to the cent as the statements do, the same method reproduces the line items of all 114 full-month interim-rate statements and all 102 February–March 2026 prior-tariff statements to within \$0.02. Statements are available for inspection with resident consent.

Respectfully submitted,

Scott Carter
Cypress, Texas