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PUBLIC UTILITY COMMISSION
FILING CLERK

PETITION TO INQUIRE INTO THE
REASONABLENESS OF THE RATES
AND SERVICES OF CAP ROCK
ENERGY CORPORATION

§
§
§
§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**CAP ROCK ENERGY CORPORATION'S
SUPPLEMENTAL RESPONSE TO THE CITY OF GREENVILLE'S
NINTH REQUESTS FOR INFORMATION, QUESTION NO. 17**

To: The City of Greenville, by and through its attorney Jim Boyle, 1005 Congress Avenue,
Suite 550, Austin, Texas 78701

Cap Rock Energy Corporation ("Cap Rock" or the "Company") files its supplemental
response to the City of Greenville's Ninth Requests for Information, Question No. 17. This
supplemental response may be treated by all parties as if it was filed under oath.

Respectfully submitted,

LLOYD GOSSELINK BLEVINS
ROCHELLE & TOWNSEND, P.C.
111 Congress Avenue, Suite 1800
Austin, Texas 78701
(512) 322-5830
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LAMBETH TOWNSEND
State Bar No. 20167500

JOYCE BEASLEY
State Bar No. 01987300

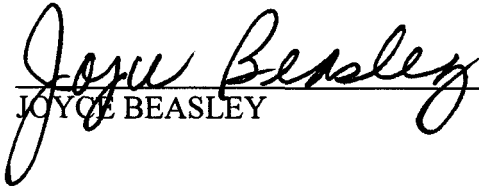
MELISSA E. RAMIREZ
State Bar No. 24027645

ATTORNEYS FOR CAP ROCK ENERGY
CORPORATION

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CERTIFICATE OF SERVICE

I, JOYCE BEASLEY, attorney, certify that a copy of this document was served on all parties of record in this proceeding on this the 28th day of September, 2004, in the following manner: hand delivered, sent via facsimile, or mailed by First Class Mail.


JOYCE BEASLEY

**SOAH DOCKET NO. 473-04-3554
PUC DOCKET NO. 28813**

**CAP ROCK ENERGY CORPORATION'S SUPPLEMENTAL RESPONSE TO THE
CITY OF GREENVILLE'S NINTH REQUESTS FOR INFORMATION,
QUESTION NO. 17**

Greenville 9-17: Referring to Mr. Crowley's testimony, page 18, lines 12-20, provide a breakdown of the \$598,329 of distribution plant reclassified to O&M expenses. For each item, provide a description of the costs and explain why it should be expensed rather than capitalized.

RESPONSE:

After further review of the work orders included in Mr. Crowley's adjustment, it was determined that some of the work orders closed after the end of the test period. Removal of those work orders results in an adjustment of \$432,190. See the revised attachment for more detail supporting this adjustment.

Prepared by: John Rainey
Sponsored by: John Rainey

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WO Allocation-2003 REWORKED

WO	NAME	WODCLS	NUMBER	CLOSE	CONS LABOR	CONS MATERIA	CONS OVERHE	CONS OTHER	CONS TOTAL
135405	CRE STANTON	200305	2		\$1,844.69	\$0.00	\$5,258.70	\$6,568.05	\$13,671.44
139473	CAP ROCK ENERGY	200305	2		\$269.47	\$0.00	\$1,137.92	\$1,430.21	\$2,837.60
141943	CRE STANTON	200305	3		\$4,486.47	\$0.00	\$16,926.50	\$5,154.07	\$26,567.04
141949	CRE STANTON	200305	2		\$1,670.70	\$0.00	\$6,306.44	\$4,460.18	\$12,437.32
147081	CRE LONE WOLF	200305	2		\$9,625.77	\$0.00	\$27,417.60	\$12,498.09	\$49,541.46
149046	CRE STANTON	200305	2		\$0.00	\$0.00	\$0.00	\$2,759.52	\$2,759.52
154342	CRE LONE WOLF	200305	2		\$2,158.02	\$0.00	\$5,689.09	\$6,731.54	\$14,578.65
158144	CRE LONE WOLF	200305	2		\$5,354.08	\$0.00	\$12,682.72	\$26,099.97	\$44,136.77
159696	CRE STANTON	200305	2		\$0.00	\$0.00	\$0.00	\$25,502.14	\$25,502.14
166753	CRE STANTON	200305	2		\$150.78	\$0.00	\$394.79	\$292.05	\$837.62
171248	CRE LONE WOLF	200304	1		\$550.93	\$0.00	\$1,718.14	\$553.34	\$2,822.41
175079	CRE STANTON	200305	2		\$4,643.43	\$0.00	\$10,282.09	\$10.97	\$14,936.49
175081	CRE STANTON	200305	2		\$2,997.31	\$0.00	\$6,533.90	\$610.80	\$10,142.01
175082	CRE STANTON	200305	2		\$3,760.23	\$0.00	\$8,056.90	\$8.47	\$11,825.60
175084	CRE STANTON	200305	2		\$2,835.35	\$0.00	\$5,941.65	\$138.61	\$8,915.61
175087	CRE STANTON	200305	2		\$4,591.56	\$0.00	\$10,232.50	\$253.88	\$15,077.94
175092	CRE STANTON	200305	2		\$3,463.44	\$0.00	\$8,427.73	\$9.54	\$11,900.71
175096	CRE STANTON	200305	2		\$221.49	\$0.00	\$402.19	\$0.00	\$623.68
175098	CRE STANTON	200305	2		\$0.00	\$0.00	\$0.00	\$9,670.31	\$9,670.31
175317	CRE LONE WOLF	200305	1		\$1,329.67	\$0.00	\$2,911.41	\$412.51	\$4,653.59
176511	CRE STANTON	200304	1		\$68.09	\$0.00	\$171.24	\$375.29	\$614.62
176754	CRE LONE WOLF	200304	1		\$310.15	\$0.00	\$462.20	\$0.00	\$772.35
177738	MC CULLOCH JAN-200	200305	2		\$2,301.77	\$0.00	\$3,356.13	\$5,362.40	\$11,020.30
177760	CRE STANTON	200304	1		\$9,815.60	\$0.00	\$11,662.61	\$21.12	\$21,499.33
177761	CRE STANTON	200304	1		\$1,520.29	\$0.00	\$2,039.11	\$4.13	\$3,563.53
177762	CRE STANTON	200304	1		\$2,555.14	\$0.00	\$3,183.96	(\$410.19)	\$5,328.91
177763	CRE STANTON	200304	1		\$1,181.96	\$0.00	\$1,574.09	\$0.00	\$2,756.05
177765	CRE STANTON	200304	1		\$1,180.24	\$0.00	\$1,377.33	\$0.00	\$2,557.57
177766	CRE STANTON	200304	1		\$2,265.07	\$0.00	\$2,826.21	\$4.71	\$5,095.99
177768	CRE STANTON	200304	1		\$435.55	\$0.00	\$572.40	\$0.00	\$1,007.95
177770	CRE STANTON	200304	1		\$1,264.37	\$0.00	\$1,538.32	\$0.00	\$2,802.69
177772	CRE STANTON	200304	1		\$2,122.31	\$0.00	\$2,718.89	\$4.37	\$4,845.57
177776	CRE STANTON	200304	1		\$0.00	\$0.00	\$0.00	\$54,350.14	\$54,350.14
177778	CRE STANTON	200304	1		\$0.00	\$0.00	\$0.00	\$16.09	\$16.09
177966	CRE STANTON	200308	1		\$907.40	\$0.00	\$948.03	\$18,190.12	\$20,045.55
179424	CRE STANTON	200304	1		\$126.96	\$0.00	\$143.10	\$457.30	\$727.36
179702	CRE H/C	200304	1		\$30.34	\$0.00	\$35.77	\$25.98	\$92.09
180907	MC CULLOCH FEB. 20	200304	1		\$8,836.06	\$0.00	\$13,082.04	\$0.00	\$21,918.10
181243	CRE LONE WOLF	200307	1		\$1,811.41	\$0.00	\$2,501.15	\$65.18	\$4,377.74
182009	CRE HUNT COLLIN	200306	1		\$138.48	\$0.00	\$172.24	\$91.50	\$402.22
182377	CRE STANTON	200304	1		\$0.00	\$0.00	\$0.00	\$9,061.26	\$9,061.26
182379	CRE STANTON	200304	1		\$1,270.56	\$0.00	\$1,846.20	\$3,359.09	\$6,475.85
183114	CRE STANTON	200304	1		\$120.86	\$0.00	\$154.11	\$50.47	\$325.44
183865	CAP ROCK ENERGY	200304	1		\$274.00	\$0.00	\$332.74	\$71.78	\$678.52
183944	CRE STANTON	200311	1		\$16,666.34	\$2,396.29	\$20,073.42	\$19,551.75	\$58,687.80
183948	CRE STANTON	200311	1		\$4,305.71	\$182.90	\$5,864.97	\$363.80	\$10,717.38
183949	MC CULLOCH O.H.-CA	200305	1		\$5,144.28	\$0.00	\$7,658.89	\$1,297.51	\$14,100.68
183955	CRE STANTON	200305	1		\$0.00	\$0.00	\$0.00	\$15,014.39	\$15,014.39
184178	CRE HUNT COLLIN	200304	1		\$629.89	\$0.00	\$776.40	\$871.44	\$2,277.73
184192	CRE LONE WOLF 107-	200307	1		\$1,680.69	\$0.00	\$2,187.23	\$349.09	\$4,217.01
186091	CRE STANTON	200305	1		\$6,929.73	\$344.71	\$9,239.28	\$8,125.67	\$24,639.39
186204	CRE H/C DIVISION	200305	1		\$0.00	\$0.00	\$0.00	\$53.27	\$53.27
187093	CAP ROCK ENERGY	200305	1		\$386.41	\$0.00	\$493.71	\$6.07	\$886.19
187102	CAP ROCK ENERGY	200305	1		\$386.41	\$0.00	\$493.71	\$6.07	\$886.19
187144	CRE HUNT COLLIN	200306	1		\$117.13	\$0.00	\$147.88	\$0.00	\$265.01
187151	CRE HUNT COLLIN	200306	1		\$117.13	\$0.00	\$151.15	\$0.00	\$268.28
187199	CRE H/C DIVISION	200304	1		\$52.57	\$0.00	\$55.46	\$25.98	\$134.01
187200	CRE H/C DIVISION	200304	1		\$52.57	\$0.00	\$55.46	\$28.17	\$136.20
187913	MC CULLOCH CAP API	200310	1		\$1,991.30	\$124.62	\$3,105.75	\$73.82	\$5,295.49
187916	CRE LONE WOLF	200310	1		\$477.86	\$0.00	\$587.13	\$14.32	\$1,079.31
187918	CRE STANTON	200311	1		\$20,138.28	\$17,164.09	\$25,495.13	\$155.53	\$62,953.01
187919	CRE STANTON	200311	1		\$10,094.28	\$1,520.87	\$13,737.13	\$22.06	\$25,374.34
187920	CRE STANTON	200306	1		\$0.00	\$30,637.42	\$0.00	\$0.00	\$30,637.42
187927	CAP ROCK ENERGY	200305	1		\$606.07	\$394.03	\$795.41	\$0.00	\$1,795.51
188485	CRE STANTON	200305	1		\$245.41	\$216.76	\$343.50	\$0.00	\$805.67
188574	CRE STANTON	200306	1		\$97.55	\$4,113.91	\$137.55	\$0.00	\$4,349.01
188648	CRE HUNT COLLIN	200305	1		\$88.41	\$58.70	\$103.75	\$0.00	\$250.86
188664	CRE HUNT COLLIN	200305	1		\$88.41	\$58.70	\$103.75	\$0.00	\$250.86
188667	CRE HUNT COLLIN	200305	1		\$88.41	\$43.19	\$103.75	\$0.00	\$235.35
189060	CRE STANTON	200305	1		\$25.51	\$116.34	\$34.58	\$0.00	\$176.43
190312	MC CULLOCH OCT. 200	200304	1		\$8,905.22	\$0.00	\$13,004.96	\$2,456.26	\$24,366.44
191089	CRE STANTON	200306	1		\$44.43	\$70.57	\$51.49	\$0.00	\$166.49
191721	CRE STANTON	200307	1		\$20,212.57	(\$22,419.70)	\$24,221.58	\$169.72	\$22,184.17
191723	CRE STANTON	200311	1		\$9,311.08	\$12,033.68	\$12,841.54	\$73.79	\$34,260.09
191724	CRE STANTON	200307	1		\$0.00	\$30,336.36	\$0.00	\$66.86	\$30,403.22
191743	MC CULLOCH O.H. CO	200310	1		\$1,332.87	\$15,284.94	\$2,136.33	\$231.05	\$18,985.19
192459	LONE WOLF	200310	1		\$818.10	\$48,032.10	\$1,236.44	\$666.71	\$50,753.35
192931	CRE STANTON	200306	1		\$158.96	\$418.46	\$205.94	\$0.00	\$783.36
194187	CRE	200308	1		\$112.67	\$1,982.53	\$129.75	\$0.00	\$2,224.95
194582	MC CULLOCH JUNE 21	200310	1		\$779.28	(\$649.63)	\$1,097.35	\$9.38	\$1,236.38
195058	CRE STANTON	200311	1		\$8,081.34	\$6,956.70	\$10,274.33	\$30.95	\$25,343.32
195059	CRE STANTON	200311	1		\$6,730.99	\$3,185.34	\$9,027.49	\$25.84	\$18,969.66
195061	CRE STANTON	200308	1		\$0.00	\$23,543.20	\$0.00	\$45.92	\$23,589.12

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WO Allocation-2003 REWORKED

NO	NAME	WODCLS	NUMBER	CLOSE	CONS LABOR	CONS MATERIA	CONS OVERHE	CONS OTHER	CONS TOTAL
96652	CRE LONE WOLF	200310	1		\$66.20	\$4,197.85	\$68.71	\$44.75	\$4,377.51
97964	CRE STANTON	200311	1		\$19,267.77	\$14,825.23	\$23,411.15	\$114.52	\$57,618.67
97965	CRE STANTON	200311	1		\$16,078.59	\$1,702.74	\$22,261.82	\$75.29	\$40,118.44
97966	CRE STANTON	200311	1		\$0.00	\$7,942.85	\$0.00	\$0.00	\$7,942.85
98113	CRE STANTON	200308	1		\$277.24	\$1,612.41	\$343.59	\$0.00	\$2,233.24
98724	CRE	200308	1		\$30.18	\$204.20	\$34.36	\$0.00	\$268.74
99481	CRE LW	200311	1		\$0.00	\$10,225.90	\$0.00	\$89.07	\$10,314.97
00406	CRE LONE WOLF (ME	200311	1		\$0.00	\$2,603.73	\$0.00	\$26.57	\$2,630.30
01212	MC CULLOCH AUG. 20	200310	1		\$4,175.01	\$4,318.01	\$6,339.76	\$27.77	\$14,860.55
01224	CRE STANTON	200311	1		\$19,482.42	\$16,090.72	\$24,277.80	\$149.42	\$60,000.36
01225	CRE STANTON	200311	1		\$6,649.74	\$2,322.35	\$9,219.42	\$45.80	\$18,237.31
01226	CRE STANTON	200310	1		\$0.00	\$5,012.06	\$0.00	\$12.74	\$5,024.80
02154	CRE STANTON	200309	1		\$145.35	\$19.32	\$187.81	\$0.00	\$352.48
02677	CRE LONE WOLF	200311	1		\$1,791.50	\$6,135.82	\$2,039.75	\$68.38	\$10,035.45
03454	CRE STANTON	200309	1		\$73.64	\$3.07	\$102.44	\$0.00	\$179.15
04409	CRE STANTON	200312	2		\$16,838.71	\$66,056.81	\$22,135.60	\$118.59	\$105,149.71
04411	CRE STANTON	200311	1		\$10,681.32	\$1,495.91	\$16,384.21	\$49.54	\$28,610.98
04412	CRE STANTON	200311	1		\$0.00	\$24,715.41	\$0.00	\$28.78	\$24,744.19
04575	MC CULLOCH OH CAP	200312	1		\$708.13	\$13,342.51	\$1,057.43	\$101.61	\$15,209.68
04781	CRE LONE WOLF REF	200312	1		\$654.42	\$6,847.02	\$659.59	\$56.77	\$8,417.80
07951	CRE STANTON	200312	1		\$20,351.37	\$62,548.86	\$24,462.55	\$263.11	\$107,625.89
07952	CRE STANTON	200312	1		\$10,348.53	\$17,055.80	\$15,893.94	\$100.72	\$43,398.99
07953	CRE STANTON	200312	1		\$0.00	\$36,148.65	\$0.00	\$85.21	\$36,233.86
07985	MC CULLOCH RPL OC	200312	1		\$1,603.58	\$17,014.82	\$2,419.37	\$96.66	\$21,134.43
08967	CRE LONE WOLF REF	200312	1		\$1,139.83	\$6,216.38	\$1,545.71	\$43.45	\$8,945.37
11325	MC CULLOCH RPL NO	200312	1		\$108.16	\$14.63	\$151.39	\$0.00	\$274.18
11540	CRE STANTON	200312	1		\$1,337.22	\$216.32	\$1,673.56	\$6.04	\$3,233.14
11543	CRE STANTON	200312	1		\$18,042.49	\$15,202.81	\$24,352.05	\$125.93	\$57,723.28
11546	CRE STANTON	200312	1		\$0.00	\$922.76	\$0.00	\$0.00	\$922.76
11963	HUNT/COLLIN	200312	1		\$3,762.75	\$2,482.26	\$4,075.59	\$20.04	\$10,340.64
11964	HUNT/COLLIN CAPITO	200312	1		\$825.96	\$0.00	\$851.60	\$7.83	\$1,685.39
12035	REPLACE NOV. 2003	200312	1		\$4,156.24	\$386.84	\$6,131.46	\$24.91	\$10,699.45
12036	INSTALL NOV. 2003	200312	1		\$22.29	\$185.81	\$37.85	\$0.00	\$245.95
12157	CRE LW REPLACE	200312	1		\$546.78	\$3,331.25	\$681.28	\$21.30	\$4,580.61
13191	CRE STANTON	200312	1		\$1,127.14	\$961.74	\$1,533.42	\$4.04	\$3,626.34
13192	CRE STANTON	200312	1		\$23,155.18	\$9,615.25	\$30,504.11	\$59.89	\$63,334.43
13199	REPLACE DEC 2003	200312	1		\$4,960.11	\$228.68	\$6,863.88	\$0.00	\$12,052.67
13200	INSTALL DEC. 2003	200312	1		\$54.25	\$0.00	\$73.02	\$0.00	\$127.27
13244	HUNT COLLIN	200312	1		\$3,642.12	\$2,183.03	\$4,344.69	\$11.23	\$10,181.07
13377	CRE LONE WOLF REF	200312	1		\$808.96	\$557.50	\$1,022.28	\$2.63	\$2,391.37
13676	CRE STANTON	200312	1		\$0.00	\$2,454.40	\$0.00	\$0.00	\$2,454.40
13709	HUNT COLLIN CAPITO	200312	1		\$36.38	\$0.00	\$36.51	\$0.00	\$72.89
					\$408,337.40	\$543,548.79	\$602,368.03	\$245,883.00	\$1,800,137.22
O'S PRIOR OCT-03					\$273,150.56	\$471,794.61	\$360,186.51	\$23,101.59	\$1,128,233.27
		All W/O		% of Non Mtr Tot					
	Materials	\$494,896.20							
	Meters	116,288.28							
	Non meters	378,607.92							
	Cpr Material(ex Mtr)	247,886.35		65.5%					
	Exp Type Mat	130,721.57		34.5%					
	Allocation of Labor								
	Total	\$273,150.56							
	Cap 65.5%	143,130.89							
	Exp34.5%	130,019.67							
	Allocation of O/H								
	Total	\$360,186.51							
	Cap 65.5%	188,737.73							
	Exp34.5%	171,448.78							
	ap Costs								
	ltrs	\$ 116,288.28							
	on Mtr Cpr	\$ 247,886.35							
	abor	\$ 143,130.89							
	/H	\$ 188,737.73							
	otal Cap	\$ 696,043.25							
	xp Costs								
	ltrs	\$ -							
	on Cpr Material	\$ 130,721.57							
	abor	\$ 130,019.67							
	/H	\$ 171,448.78							
	otal Exp	\$ 432,190.02							
	OTAL	\$1,128,233.27							

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