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RECEIVED  
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PUBLIC UTILITY COMMISSION  
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APPLICATION OF DOUGLAS  
UTILITY COMPANY TO  
CHANGE WATER AND SEWER  
RATE/TARIFF IN HARRIS  
COUNTY, TEXAS

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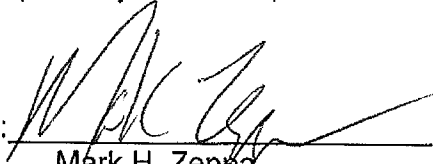
BEFORE THE STATE PUBLIC UTILITY COMMISSION  
OF  
ADMINISTRATIVE HEARINGS

DOUGLAS UTILITIES RESPONSE TO  
RAINBOW HOUSING ASSISTANCE CORPORATION'S  
FIRST REQUEST FOR PRODUCTION

TO: Rainbow Housing Assistance Corporation, by and through its Attorney of Record,  
John L. Wilson, McGinnis Lochridge, 600 Congress Avenue, Suite 2100, Austin,  
Texas 78701

Comes now Douglas Utility Company which provides these responses to  
Rainbow Housing Assistance Corporation's First Request for Production.

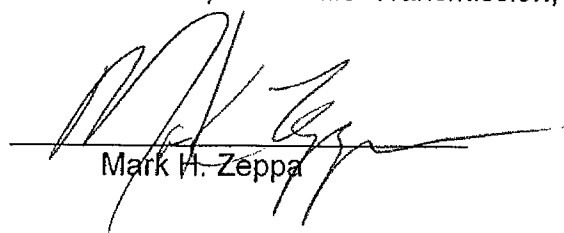
Respectfully submitted,

By: 

Mark H. Zeppa  
State Bar No. 22260100  
Law Offices of Mark H. Zeppa, PC  
4833 Spicewood Springs Road #202  
Austin, Texas 78759-8435  
(512) 346-4011, Fax (512) 346-6847

CERTIFICATE OF SERVICE

I, Mark H. Zeppa, hereby certify that copies of the foregoing were provided to the  
parties of record as shown on the Service List below on  
February 28, 2014, by First Class Mail, Facsimile Transmission,  
hand delivery or electronic transmission.

  
Mark H. Zeppa

## REQUESTS FOR PRODUCTION

1. Douglas' general ledger and financial statements for the Test Year and for the time since the Test Year.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

2. The backup invoices and other information to support the information contained in Request No. 1 above.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

3. Invoices or documents that support the original cost at the time of installation of all waste water and water treatment facilities and collection and distribution systems as listed in the Application.

Response: This information is contained in the Trend Study has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

4. Backup invoices and other information to support the information provided under Request No. 3 above.

Response: See RFP No. 3.

5. Documents showing the number of gallons of water pumped during the Test Year and for the time since the Test Year by Douglas.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

6. Documents showing the number of gallons of water for which Douglas has billed customers during the Test Year and the time since the Test Year.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

7. Number of Customers service by Douglas during the Test Year, and number of Customers currently being served; and breakdown on the types of Customers by class of service or customer class.

Response: See rate change application.

8. Documents showing any projections related to future water and wastewater needs of Customers served by Douglas.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

9. Documents supporting the need for the surcharge requested by Douglas.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

10. Copies of applications for loans and any loan documents and agreements for the New or Replacement Water and/or Wastewater Treatment Facility.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

11. Copies of the terms and conditions of any loans that Douglas has obtained since January 1, 2011 and copies of the terms and conditions of any loans that Douglas is contemplating obtaining since January 1, 2011.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

12. Documents showing the estimated costs for the New or Replacement Water and/or Wastewater Treatment Facility including, but not limited to engineering, equipment and construction costs.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

13. Documents supporting the need for the New or Replacement Water and/or Wastewater Treatment Facility.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

14. Construction plans or design plans for the New or Replacement Water and/or Wastewater Treatment Facility.

Response: None at this time.

15. Documents supporting Douglas' rate design structure.

Response: See rate change application.

16. Documents related to any cost savings measures, programs, or plans that Douglas has implemented or is contemplated implementing.

Response: None at this time.

17. Copies of any contracts or other agreements between Douglas and the operator(s) used to operate, repair, and/or maintain the water treatment facility and the waste water treatment facility.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

18. Copies of reports from the operator(s) of the Douglas water treatment facility and the Douglas waste water treatment facility related to the operation, repair and/or maintenance of those facilities during the Test Year and the time since the Test Year.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

19. Copies of any correspondence between Douglas and the Texas Commission on Environmental Quality for the last five years.

Response: This information is public record at the TCEQ and is as easily available to Rainbow as it is to DUC.

20. Copies of any rate studies or other documents showing how Douglas allocated costs to the various Customer classes.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information and is found in the rate change application. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

21. Other documentation that Douglas believes supports its request for rate change in the Application and/or Douglas' surcharge request.

Response: Objection. This request is too vague and too global to answer with certainty. The documentation DUC has at this time has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be

made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

22. All drafts of any proposed agreements between Douglas and the operator(s) or future operator(s) of the water treatment facility and wastewater treatment facility.

Response: None

23. All documents, including, but not limited to, any hand-written notes, relating to any meetings that Douglas has had with any engineering, design, or other company or person related to the design of the New or Replacement Water and/or Wastewater Treatment Facility or its construction or its need.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

24. All correspondence or communications relating to the subject matter of This Matter between Douglas and any person than the TCEQ.

Response: Objection. This request is too vague and too global to answer with certainty. The documentation DUC has at this time has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. All documents given or made available to the TCEQ will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.

25. All written, verbal, recorded, or any other kind of statement relevant to any issue in This Matter.

Response: This information will be provided as prefiled testimony per the agreed upon hearing schedule in Order No. 1.

26. All forecasts, business plans, marketing plans, cost studies and/or similar documents relating to Douglas' operations and/or relating to the New or Replacement Water and/or Wastewater Treatment Facility.

Response: None. The refurbished WWTP will be operated the same as the current plant is but with few repairs needed.

27. All documents that in any way project sales and/or profits regarding Douglas' business activities.

Response: See rate change application.

28. All exhibits that Douglas intends to offer at the evidentiary hearing.

Response: This information will be provided as prefiled testimony per the agreed upon hearing schedule in Order No. 1.

29. All videotapes, audiotapes, or other recordings that Douglas plans to present at the evidentiary hearing.

Response: This information will be provided as prefiled testimony per the agreed upon hearing schedule in Order No. 1.

30. Documents supporting Douglas' listing of the land original cost of \$99,142 on the Original Cost and Depreciation Schedule-Sewer included with the Application.

Response: This information has been provided in response to the Executive Directors 1<sup>st</sup> Requests for Information. The documents in question will be made available for inspection upon appointment with the Law Offices of Mark H. Zeppa, PC.