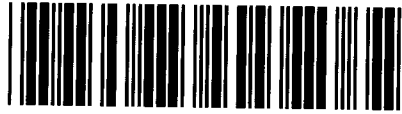


Control Number: 42914



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Addendum StartPage: 0

DOCKET NO. 42914

APPLICATION OF SAN ANTONIO RIVER AUTHORITY AND W&W WATER, INC. FOR THE SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN WILSON COUNTY §  
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2015 JAN 23  
PUBLIC UTILITY COMMISSION OF TEXAS

**COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION TO SAN ANTONIO RIVER AUTHORITY  
STAFF RFI NO. 1-1 THROUGH 1-5**

To: San Antonio River Authority, through its its Utilities Operations Superintendent, Daniel Flores, 100 East Guenther Street, P.O. Box 839980, San Antonio, Texas 78283

Pursuant to P.U.C. PROC. R. 22.144, Commission Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that San Antonio River Authority provide responses and produce documents in response to Staff's First Request for Information (1st RFI).

Provide an original and three (3) copies of your responses to:

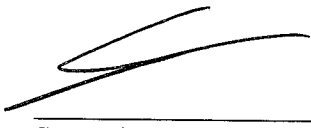
Public Utility Commission of Texas  
Attention: Filing Clerk  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326

Date: January 23, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director  
Legal Division

Shelah Cisneros  
Managing Attorney  
Legal Division



Sam Chang  
State Bar No. 24078333  
Attorney, Legal Division

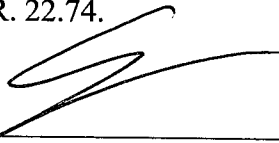
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Public Utility Commission of Texas  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7261  
(512) 936-7268 (facsimile)  
sam.chang@puc.texas.gov

**DOCKET NO. 42914**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on January 23, 2015, in accordance with P.U.C. PROC. R. 22.74.

  
\_\_\_\_\_  
Sam Chang

**COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION TO SAN ANTONIO RIVER AUTHORITY  
STAFF RFI NO. 1-1 THROUGH 1-5**

**INSTRUCTIONS**

1. SARA's responses to Staff's 1st RFI shall be provided within the time limit provided by the presiding officer or, if the presiding officer has not provided a time limit, within twenty (20) days.
2. SARA's responses to Staff's 1st RFI shall be in sufficient detail to fully present all of the relevant facts.
3. Each response must be made under oath and identify the person that prepared the response or the person under whose direct supervision the response was prepared. Additionally, each response must also identify the sponsoring witness, if any.
4. Copy the specific question or document request immediately above each response. With respect to the production of documents, indicate the specific document request(s) to which the documents are being produced.
5. SARA has a continuing duty to supplement its responses to Staff's 1st RFI if it acquires information upon the basis of which it knows or should know that the response was incorrect or incomplete when made or though correct or complete when made, is materially incorrect or incomplete. SARA shall amend its prior response within five (5) working days of acquiring the information.
6. Electronically Stored Information and Documents in an electronic format shall be produced with metadata intact.
7. If the response to any request is voluminous, provide a detailed index of the voluminous material and the means by which Staff may obtain the voluminous material.
8. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
9. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
10. The terms "and" and "or" shall be construed as either conjunctive or conjunctive as necessary to make the request inclusive rather than exclusive.

**COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION TO SAN ANTONIO RIVER AUTHORITY  
STAFF RFI NO. 1-1 THROUGH 1-5**

**DEFINITIONS**

1. "SARA" or "you" refers to the San Antonio River Authority and any entity or person acting on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, independent contractors, expert witnesses, or other persons.
2. "Document" is used in its broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description, whether printed, produced, or reproduced by any process (visually, magnetically, mechanically, electronically, or by hand); whether a final draft, initial draft, original copy, or reproduction; whether claimed as privileged or otherwise excludable from discovery; and whether or not in your actual or constructive possession, custody, or control. The term includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to Electronically Stored Information, correspondence, e-mails, telegrams, contracts, agreements, notes in any form, memoranda, reports, invoices, ledgers, spreadsheets, data, models, diaries, compilations, voice recording tapes, microfilms, pictures, computer media, workpapers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.
3. "Electronically Stored Information" means data that is created, altered, communicated, and stored in digital form.
4. "Including" means and refers to "including but not limited to."
5. "Regarding" includes the following meanings: relating to, pertaining to, concerning, discussing, mentioning, containing, reflecting, evidencing, describing, showing, identifying, providing, disproving, consisting of, supporting, or contracting in any way legally, logically, or factually connected with the matter to which the term refers or having a tendency to prove or disprove the matter to which the term refers.
6. "W&W Water" refers to W&W Water, Inc. and any entity or person acting on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, independent contractors, or other persons.

**COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION TO SAN ANTONIO RIVER AUTHORITY  
STAFF RFI NO. 1-1 THROUGH 1-5**

**STAFF RFI NO. 1-1** Refer to page 12 of SARA's application. State the identity of the individual that prepared SARA's stated projected income for Years 1 through 5 in the Projection Income Statement section.

**STAFF RFI NO. 1-2** Provide a copy of all Documents that SARA provided to W&W Water in conjunction with W&W Water's purchase of SARA's assets.

**STAFF RFI NO. 1-3** Provide a detailed list of:

- a. SARA's current machinery, equipment, and fixtures.
- b. The book and market value of SARA's current machinery, equipment, and fixtures.
- c. The dollar amount of depreciation regarding SARA's current machinery, equipment, and fixtures.

**STAFF RFI NO. 1-4** Provide copies of SARA's financial statements for the years 2013 and 2014.

**STAFF RFI NO. 1-5** Refer to page 12 of SARA's application. Provide all Documents that support SARA's stated gross revenue figure of \$209,999 for Year 1 in the Projected Income Statement section.