



Control Number: 42940



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DOCKET NO. 42940

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APPLICATION OF NORTH ORANGE §
WATER & SEWER L.L.C DBA §
COUNTRY SQUIRE WATER AND §
SEWER FOR A RATE/TARIFF §
CHANGE (37820-R AND 37821-R) §

PUBLIC UTILITY COMMISSION
FILING CLERK
OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
NORTH ORANGE WATER & SEWER L.L.C
D/B/A COUNTRY SQUIRE WATER AND SEWER (NORTH ORANGE)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-17**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that North Orange Water & Sewer L.L.C d/b/a Country Squire Water (North Orange) by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

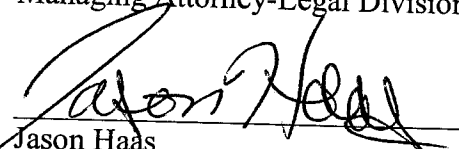
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Dated: November 21, 2014

Respectfully Submitted,

Joseph P. Younger
Division Director-Legal Division

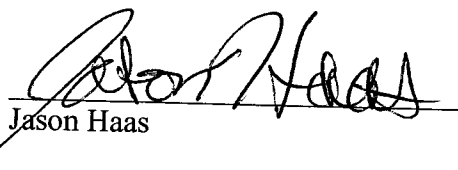
Karen S. Hubbard
Managing Attorney-Legal Division



Jason Haas
Attorney-Legal Division
State Bar No. 24032386
(512) 936-7295
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on November 21, 2014 in accordance with Public Utility Commission of Texas Procedural Rule 22.74.



Jason Haas

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DEFINITIONS

- A. **“North Orange”**, **“the Company”** or **“you”** refers to North Orange Water & Sewer L.L.C d/b/a Country Squire Water and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. **“Document”** includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, 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. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of **“documents”** shall include the documents which do not exist and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to P.U.C. Proc. R. 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) 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.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to P.U.C. Proc. R. 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**Note: The items marked with an asterisk "*" should be submitted as confidential filings with the PUC. Please follow the instructions for filing confidential documents when you file these items.*

- Staff 1-1 Please provide a Statement of Revenue and Expenses for the 12 month period including the rate study and/or budget which was utilized in establishing the new rates per the test year.
- Staff 1-2 Please provide monthly operating reports with the total number of gallons pumped and billed during the test year.
- Staff 1-3 Please provide copies of the loan agreement and amortization schedule of debt service, if any for the test year.
- Staff 1-4 Please provide a monthly summary of tax or revenues collected from the ratepayers to pay for any capital improvements or operations and maintenance and/or any cost of service item for the test year.
- Staff 1-5 Please provide general ledgers, invoices and documentation supporting the cost of service revenue requirement per the test year.
- Staff 1-6 Please provide a Subsidiary Ledger (Detailed General Ledger) of expenses for the test year and the prior two years.
- Staff 1-7 Please provide a schedule of assets paid for with a positive cash value on the effective date of the rate change.
- Staff 1-8 Please provide Balance Sheet and Income Statements for the test year and prior two years.
- Staff 1-9 Please provide the original cost, date of installation and service life for each asset that is included under the item titled "Total Water Plant" that was included in the depreciation schedule.
- Staff 1-10 Please provide the original cost, date of installation and service life for each asset that is included under the item titled "Total Sewer Plant" that was included in the depreciation schedule.

- Staff 1-11 Please provide invoices or supporting documents for all the assets to support the original costs of those assets.
- Staff 1-12 Please provide copies of Income Tax Returns for the test year and prior 2 years.*
- Staff 1-13 Please provide copies of W-2s, and 1099s for salaries and contract labor, respectively for the test year.*
- Staff 1-14 Please provide the amount of the regulatory assessment fee paid to Texas Commission on Environmental Quality during the test year. If included in the Statement of Revenue and Expense, please indicate the expense account.
- Staff 1-15 Please provide the minutes of the meeting held by the board, if applicable, to increase the water and/or sewer rates
- Staff 1-16 Please provide a copy of the worksheet that was used to determine the rate of return
- Staff 1-17 Please provide the method used to allocate the common expenses, between water and sewer.