



Control Number: 43069



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DOCKET NO. 43069

APPLICATION OF INLINE  
DEVELOPMENT LLC FOR A  
RATE/TARIFF CHANGE

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§  
§

PUBLIC UTILITY COMMISSION

OF TEXAS

2016 FEB 23 PM 2:34  
PUBLIC UTILITY COMMISSION  
FILING CLERK

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO INLINE DEVELOPMENT LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3

Pursuant to 16 Tex. Admin. Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Centerpoint Energy Houston Electric, LLC (CenterPoint Energy) 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.

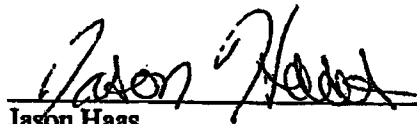
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: February 23, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director-Legal Division

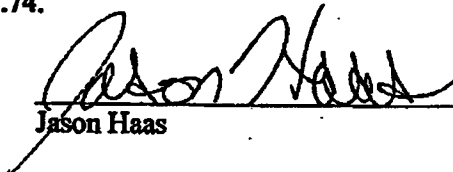
Karen S. Hubbard  
Managing Attorney - Legal Division



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 February 23, 2016 in accordance with 16 TAC § 22.74.

  
Jason Haas

**DOCKET NO. 43069**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO INLINE DEVELOPMENT LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

**DEFINITIONS**

- 1) "Inline", "the Company" or "you" refers to Inline Development LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO INLINE DEVELOPMENT LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 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 16 TAC § 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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO INLINE DEVELOPMENT LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

- Staff 1-1** For the sewer application, please provide the following:
- a) A detailed list of the repairs and maintenance that total \$60,419 that the applicant is requesting in the revenue requirement column of Table VI.A., February 2, 2016 filing.
  - b) Copies invoices exceeding \$500 for the expenses included in RFI No. 1.A.
  - c) A detailed list of the materials and supplies that total \$60,419.00 that the applicant shows in Table IV.E., February 2, 2016, filing.
  - d) Copies invoices exceeding \$500 for the expenses included in RFI No. 1.C.
  - e) Provide the detail for Table IV.D in the application with regard to debt outstanding as follows:
    - 1) name of the bank or lender;
    - 2) date of issue;
    - 3) date of maturity;
    - 4) original amount of loan;
    - 5) outstanding balance;
    - 6) interest rate;
    - 7) if the loan is only partially for sewer assets or operations, please state the amount of the loan that is for sewer;
    - 8) if only part of the loan is for sewer assets or operations, please provide the basis used to determine the percentage that is allocated to sewer.
- Staff 1-2** For the water application:
- a) Admit or deny that the applicant charges their customers \$2.32/1,000 for North Harris County Regional Water Authority (NHCRWA) pass through gallons in addition to the base rate and gallonage charges listed on the applicant's tariff.
  - b) Admit or deny that the applicant's test year purchased water of \$54,178 as shown on table VI. A of the October 29, 2014, was for the NHCRWA pass through.
- Staff 1-3** For the water application, provide the following:
- a) A detailed list of the repairs and maintenance that total \$40,280, included in the application revenue requirement column of Table VI.A., October 29, 2014 filing.
  - b) A detailed list of the materials and supplies that total \$112,033, included in the application Table IV.E., February 2, 2016 filing.
  - c) Provide the following detail for Table IV.D included in the application:
    - 1) name of the bank or lender;

- 2) date of issue;
- 3) date of maturity;
- 4) original amount of loan;
- 5) outstanding balance;
- 6) interest rate;
- 7) If the loan is only partially for water assets or operations, please state the amount of the loan that is for water;
- 8) If only part of the loan is for water assets or operations, please provide the basis used to determine the percentage that is allocated to water.

# **SOURCE ENVIRONMENTAL INC.**



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**(713) 621-4474**

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