

Control Number: 43175



Item Number: 50

Addendum StartPage: 0

SOAH DOCKET NO. 473-15-2274.WS  
PUC DOCKET NO. 43175

APPLICATION OF COMMUNITY §  
WATER SERVICE, INC. AND WALTER §  
J. CARROLL WATER COMPANY, INC. §  
FOR SALE TRANSFER OR MERGER §  
OF FACILITIES AND CERTIFICATE §  
RIGHTS IN ELLIS COUNTY §

BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

RECEIVED  
2015 OCT 27 PM 1:10  
PUBLIC UTILITY COMMISSION  
FILING CLERK

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO WALTER J. CARROLL WATER COMPANY, INC.  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6

Pursuant to 16 Tex. Admin. Code § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that Walter J. Carroll Water Company, Inc. (Carol) 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.

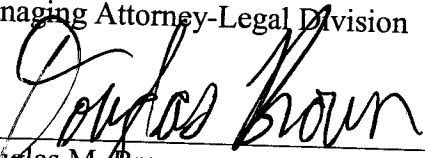
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Dated: October 27, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director-Legal Division

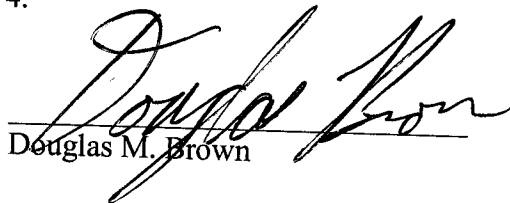
Stephen Mack  
Managing Attorney-Legal Division



Douglas M. Brown  
Attorney-Legal Division  
State Bar No. 24048366  
(512) 936-7203  
(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 October 27, 2015, in accordance with 16 TAC § 22.74.



Douglas M. Brown

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**DEFINITIONS**

- A. **“Carroll,” “the Company”** or **“you”** refers to the Walter J. Carroll Water Company, Inc. 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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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

**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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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

- Staff 1-1** Please provide a detailed explanation why there aren't any UNADJ 12/31/2014 amounts reported for revenues and expenditures.
- Staff 1-2** Please provide a detailed explanation and supporting schedules indicating why the assets, liabilities, equity, and net income UNADJ 12/31/2014 amounts on Carroll's S Corporation Trial Balance pages 42 thru 44 do not match the Accrual Basis Balance Sheet and Profit and Loss Statement as of 12/31/2014,
- Staff 1-3** Please provide a copy of your 2014 Tax Return filed with the IRS, \*
- Staff 1-4** Please provide a copy of audited accrual financial statements as of 12/31/2014 for Carroll and supporting general ledger.
- Staff 1-5** Please provide a detailed listing of Carroll's principal and interest payments for year end 12/21/2014.
- Staff 1-6** Please provide a listing of Community Water Service, Inc.'s Red Oak Community Water Service System assets to be transferred and their historical cost information basis as well as well as their accumulated depreciation basis.

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