



Control Number: 43586



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DOCKET NO. 43586

**APPLICATION OF TRINITY SO PTN,
LP TO OBTAIN WATER AND SEWER
CERTIFICATES OF CONVENIENCE
AND NECESSITY IN HARRIS
COUNTY**

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PUBLIC UTILITY COMMISSION

OF TEXAS

**PUBLIC UTILITY COMMISSION
FILING CLERK**

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**COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO TRINITY SO PTN, LP (TRINITY SO)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

Pursuant to 16 Tex. Admin. Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that the Trinity SO PTN, LP (Trinity SO) 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: November 19, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

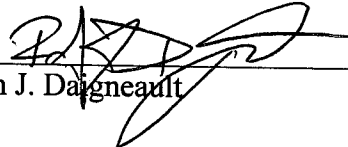
Karen S. Hubbard
Managing Attorney - Legal Division



Ralph J. Daigneault
Attorney-Legal Division
State Bar No. 24040755
(512) 936-7348
(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 19, 2015 in accordance with 16 TAC § 22.74.



Ralph J. Daigneault

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**COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO TRINITY SO PTN, LP (TRINITY SO)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

DEFINITIONS

- 1) "Trinity SO", "the Company" or "you" refers to Trinity SO PTN, LP 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 TRINITY SO PTN, LP (TRINITY SO)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

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 TRINITY SO PTN, LP (TRINITY SO)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

- Staff 1-1** Please provide financial information including a balance sheet and income statement for Trinity SO PTN, LP for 2014.
- Staff 1-2** Please provide a five year business/financial plan including narrative, income and expenses, and balance sheet information supporting Trinity SO PTN's ability to provide continuous and adequate service to the certificated area and/or current customers remaining in the proposed area. The plan should include information about investments and/or loan commitments available to meet capital improvements needed to bring the utility into compliance, if any, with the Texas Commission on Environmental Quality's minimum water quality standards.
- Staff 1-3** Please provide information regarding the current debt structure of Trinity SO PTN, LP including an amortization schedule with annual principal and interest payments for the next five years. Include a copy of the debt instrument(s).
- Staff 1-4** Please provide an explanation of the item "Goodwill" in assets and explain if Trinity SO PTN, LP plans on attempting to recover the amount of "Goodwill" in a rate proceeding.
- Staff 1-5** Please provide the Debt to Equity Ratio and the Debt Service coverage ratio for the year 2013 and 2014.
- Staff 1-6** Provide cost of services for water and wastewater, including a total revenue requirement and a detail of expenses included in the revenue requirement based on an historical test year that justifies the proposed water and wastewater rates requested in the proposed tariff.
- Staff 1-7** Is this utility currently charging for water and wastewater service? If so, please provide the current rates being charged.
- Staff 1-8** Has the applicant ever used expenses for water and wastewater provision to justify rent levels to another regulatory entity such as the United States Federal Government or an agency thereof?