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RECEIVED

APPLICATION OF MOORELAND
WATER COMPANY FOR A WATER OR
WASTEWATER RATE/TARIFF CHANGE
§

PUBLIC UTILITY COMMISSION

PUBLIC UTILITY COMMISSION

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MOORELAND WATER COMPANY (MOORELAND) QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Mooreland Water Company (Mooreland) 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: March 6, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton Division Director-Legal Division

Karen S. Hubbard Managing Attorney - Legal Division

Ralph J. Dagneault
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 March 6, 2015 in accordance with P.U.C. Procedural Rule 22.74.

Ralph J. Daigneault

# COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MOORELAND WATER COMPANY (MOORELAND) QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5

#### **DEFINITIONS**

- 1) "Mooreland", "the Company" or "you" refers to Mooreland Water Company 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.

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MOORELAND WATER COMPANY (MOORELAND) QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5

### **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.

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MOORELAND WATER COMPANY (MOORELAND) QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5

- STAFF 1-1 Reference the filing, pages 2 and 13 regarding Contract Labor/Services with Herman Pruitt Plumbing and Associated Well Services, Inc. Provide the following:
  - A. The contract:
  - B. The total amount of the expense for the year:
    - i. 2011; and
    - ii. 2012;
  - C. A breakdown of the expense for the test year.
- STAFF 1-2 Reference the filing, page 11 regarding the loan from 1<sup>st</sup> National Bank. Provide the term sheet, or loan agreement, showing the stated interest rate of 7.75%.
- **STAFF 1-3** Reference the filing, page 13. Provide the following:
  - A. A breakdown of the chemicals expense;
  - B. The total chemical expense for the years:
    - i. 2011; and
    - ii. 2012;
  - C. A copy of an electric bill supporting the utilities expense of \$8,519;
  - D. A breakdown of Repairs/Maintenance/Supplies expense;
  - E. A breakdown of Office Expenses;
  - F. A copy of the insurance premium bill; and
  - G. A breakdown of Miscellaneous Expenses.
- STAFF 1-4 Advise if the owner has ever contributed any of his own money to purchase rate base items. If yes, please provide the amount and corresponding rate base item.
- STAFF 1-5 Advise if the proposed rates went into effect for any length of time. If the rates did go into effect for any length of time, specify the time frame and the amount collected.