



Control Number: 44600



Item Number: 12

Addendum StartPage: 0

PUC DOCKET NO. 44600
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PUBLIC UTILITY COMMISSION
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APPLICATION OF ROLLING HILLS
WATER SERVICE, INC. FOR A
RATE/TARIFF CHANGE

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO ROLLING HILLS WATER SERVICE, INC.
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-10**

Pursuant to 16 Tex. Admin Code § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the Rolling Hills Water Service, Inc. ("Rolling Hills") 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: October 12, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Karen S. Hubbard
Managing Attorney - Legal Division



Alexander Petak
Attorney-Legal Division
State Bar No. 24088216
(512) 936-7377
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on October 12, 2015, in accordance with 16 TAC § 22.74.



Alexander Petak

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO ROLLING HILLS WATER SERVICE, INC.
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-10**

DEFINITIONS

- A. "Rolling Hills", "the Company" or "you" refers to Rolling Hills Water Service, 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 2-1 THROUGH STAFF 2-10**

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 2-1 THROUGH STAFF 2-10**

- Staff 2-1** Please provide a list of the agreed-upon duties for the operator from Associated Well Services, Inc. (and, if available, provide the contract between the utility and the operator) that is included in the charge of \$490.00 per month.
- Staff 2-2** If any of the agreed-upon duties listed in the Staff 2-1 request are also performed, or have been taken over, by a contract employee (Nels Nordin), please provide an explanation as to why both an operator and a contract employee are performing the same duties.
- Staff 2-3** Please provide a copy of the 2014 annual report.
- Staff 2-4** Please provide the dollar amount of the salaries of the office staff (\$32,360, as shown on page 13 of 40 of the application) that is not an annually reoccurring expense and paid for unusual and non-recurring events.
- Staff 2-5** Please provide the dollar amount of annually reoccurring expenses for the operator.
- Staff 2-6** Please provide the contract or other written, supporting documentation for the operator from Associated Well Services, Inc.
- Staff 2-7** Please refer to page 13 of 40 of your application where it indicates that \$32,360 in salaries and wage expense is included in the proposed revenue requirement. Please provide a breakdown of the payee and amount to be paid to that payee from the \$32,360.
- Staff 2-8** Please refer to page 13 of 40 of your application and explain the known and measureable salary increase of \$3,600 for labor expense.
- Staff 2-9** Please provide the total cost of the rate case expenses in this case and any supporting documentation, including name, position, hours spent, and hourly rate that is not included in the cost of service (Revenue Requirement) on page 13 of 40 of the application.
- Staff 2-10** Please provide documentation of any future required improvements including plans, anticipated costs, possible funding sources, and estimated dates of installation, if any.