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APPLICATION OF ROLLING HILLS WATER SERVICE, INC. FOR A RATE/TARIFF CHANGE

# PUBLIC UTILATY AGO MINISTED 104

OFUE DIX MISSION FILING CLERK

# COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION TO ROLLING HILLS WATER SERVICE, INC. (ROLLING HILLS) QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8

Pursuant to 16 TAC § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Rolling Hills Water Service, Inc. by and through its attorneys of record, provide the following information and answer the following questions under oath. The questions 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 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. State the name of the witness in this cause who will sponsor each answer to each 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: August 10, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton Division Director-Legal Division

Shelah J. Cisneros

Managing Attorney - Legal Division

Brian MacLeod

Attorney-Legal Division

State Bar No. 12783500

(512) 936-7230

(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 August 10,

2015 in accordance with P.U.C. Procedural Rule 22.74

Brian MacLeod

#### **DOCKET NO. 44600**

# COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION TO ROLLING HILLS WATER SERVICE, INC. (ROLLING HILLS) QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8

### **DEFINITIONS**

- 1) "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.
- 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.

#### **DOCKET NO. 44600**

# COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION TO ROLLING HILLS WATER SERVICE, INC. (ROLLING HILLS) 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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- Staff 1-1 On page 7 of 40 of the application, the salary of the Nels Nordin is shown as \$9,600, per week and the salary of Teresa Greer is shown as \$11,400 per week. If this is correct, please tie the total salaries or contract labor indicated on this page with salaries or contract labor as shown on page 13, Table VI.A. If this page is in error, please provide a corrected page to amend the application.
- Please refer to page 12 of 40, of the application. Table IV.E, row B shows Working Cash Allowance as \$36,700, which appears to be an incorrect calculation. Please confirm whether the correct calculation is \$42,806/8 = \$5,351. If you confirm that the correct calculation is \$42,806/8 = \$5,351, then please confirm whether you plan to update related data onpage 12, lines D and F of Table IV. E and line B of Table V.
- Staff 1-3 Please provide monthly operating reports with the total number of gallons pumped and billed during the application test year.
- Staff 1-4 Please provide a revised page 15 of 40 of the application. Page 15 of 40 of the application is incomplete. Please provide all gallonage information requested, including lines A, B, C, and E.
- Staff 1-5 Please provide the 2012, 2013 and 2014 annual reports.
- Please provide a copy of the detailed ledger for office expenses and if one does not exist, submit a detailed list of the office expenses. Please ensure that the ledger or list includes the date purchased, the payee, description of items purchased and the dollar amount paid. For all items over \$500.00 provide a copy of the invoice.
- Staff 1-7 Please provide copies of all invoices from Associate Well Services, from December 2013 through January 2015.
- Regarding the master meter, well pump and chlorinator described in Attachment 2, please provide the installation date and cost of each item. If the applicant has any other plant and equipment installed since the developer abandoned the system, please provide a description of the item, date installed, and cost of each item.