



Control Number: 45248



Item Number: 35

Addendum StartPage: 0

SOAH DOCKET NO. 473-16-2099.WS
PUC DOCKET NO. 45248

RECEIVED

MAY 26 AM 9:30

RATEPAYERS' APPEAL OF THE
DECISION BY THE CITY OF FRITCH
TO CHANGE RATES

§
§
§
§

BEFORE THE STATE OFFICE

OF PUBLIC UTILITY COMMISSION
FILING CLERK

ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF FRITCH
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-17

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests the City of Fritch 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.

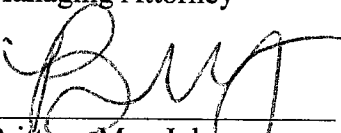
Dated: May 26, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Katherine Lengieza Gross
Managing Attorney

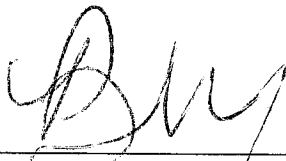


Brittany May Johnson
State Bar No. 24097888
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7235
(512) 936-7268 (facsimile)

**SOAH DOCKET NO. 473-16-2099.WS
PUC DOCKET NO. 45248**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on May 26, 2016 in accordance with 16 TAC § 22.74.



Brittany May Johnson

**SOAH DOCKET NO. 473-16-2099.WS
PUC DOCKET NO. 45248**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF FRITCH
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-17**

DEFINITIONS

- A. **"Fritch"** or **"you"** refers to the City of Fritch 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.

**SOAH DOCKET NO. 473-16-2099.WS
PUC DOCKET NO. 45248**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF FRITCH
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-17**

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(h)(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.

SOAH DOCKET NO. 473-16-2099.WS
PUC DOCKET NO. 45248

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF FRITCH
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-17**

In reference to the request for information below please provide data applicable to the test year used to calculate the rates effective October 1, 2015.

- Staff 1-1** Please state whether or not Fritch completed a cost of service study for the water rate increases for outside city customers, effective October 1, 2015. If the City of Fritch did complete a cost of service study, please produce a copy of the study.
- Staff 1-2** Please state the methodology Fritch used to set its rates which are the subject of this appeal. In your response, please also specify whether Fritch used the utility method or cash needs method to set its rates, if applicable.
- Staff 1-3** Please describe in detail the calculations used to determine the adopted water rates charged to Fritch's outside city customers. Provide the usage and tiers, if applicable, used to determine each tiered gallonage rate.
- Staff 1-4** Please identify the individual expenses that comprise the total cost of service that Fritch incurred to operate the water utility in the period used to calculate the water rates subject to this proceeding.
- Staff 1-5** Please provide documentation supporting the incurred expenses that total the cost of service; (i.e., general ledgers, invoices, etc.)
- Staff 1-6** Please explain any difference between the cost of service to provide water for outside city customers and the cost of service to provide water service to the inside city customers. Include calculations and individual expenditure items that differ, if any.
- Staff 1-7** Please provide Fritch's total water customer counts, differentiating between inside city and outside city customers. Please provide this information by meter size and class of customer, if any (e.g. retail, wholesale, residential, etc.)
- Staff 1-8** For Fritch employees, please provide the names and job titles of employees working for Fritch's water utilities. Please also indicate if each employee is salaried or paid hourly and provide the following information by employee:
- a) hire date and termination date (if applicable);
 - b) total number of hours worked per week for water;
 - c) if an employee works for other departments of the city, number of hours worked for the water, and number of hours worked for other departments;

- d) for salaried employees, provide the employees' annual salaries, and for employees paid by the hour, please provide the hourly wage amounts for each employee; and
- e) job description including the duties performed by each staff member.

- Staff 1-9** For laborers and professional staff hired under contract that provide services for the Fritch water utility, please provide the following:
- a) copy of the contract for each laborer and/or professional staff member;
 - b) name, job title and job description of each contractor;
 - c) hire date and termination date (if applicable); and
 - d) if the contract includes services for other functions of Fritch outside of the water utility, please specify what portion of the contract applies to water and include the annual contract amount paid for water contract services.
- Staff 1-10** Please identify the names of creditors of Fritch, if any. Please include the amount(s) of any and all outstanding loans at the end of the period Fritch used to determine rates subject to this proceeding. Include information to identify the type of loan, term(s), interest rate(s), and the purpose of the loan(s) extended to Fritch.
- Staff 1-11** Please identify any grants Fritch received or expected to receive regarding the water system at the time Fritch made the decision to change rates that is subject to this appeal. Please include the source, amount(s), and any other information of the grants received for the past five years or expected to be received by Fritch in the coming year.
- Staff 1-12** Please provide a summary of all rate case expenses incurred to date for the rates being appealed to date.
- Staff 1-13** Explain in detail the reason for the difference in water rates between inside city customers and outside city customers.
- Staff 1-14** Please identify the total variable costs that Fritch used to calculate the gallonage water rates for inside city and outside city customers for the period used to calculate Fritch's current water rate.
- Staff 1-15** Please provide a copy of the budget Fritch set for its water utility at the time Fritch made the decision to change rates that are the subject of this appeal.
- Staff 1-16** Please provide a copy of historical budget information for the past three years prior to the rates being changed for the Fritch water utility.
- Staff 1-17** Please provide any and all information that was available to Fritch at the time that it made the decision to change its rates and that was used to make the decision to change its rates which are the subject of this appeal.