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DOCKET NO. 45283

**RATEPAYERS' APPEAL OF THE
DECISION BY NORTH SAN SABA
WATER SUPPLY CORPORATION TO
CHANGE RATES**

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**PUBLIC UTILITY
COMMISSION OF TEXAS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 1-1 THROUGH NO. 1-28**

To: North San Saba Water Supply Corporation, through its counsel of record, Richard T. Miller, Law Office of Richard T. Miller, 414 East Wallace Street, San Saba, Texas 76877

Pursuant to 16 Tex. Admin. Code § 22.144, Commission Staff of the Public Utility Commission of Texas requests that North San Saba Water Supply Corporation provide responses and produce documents in response to Staff's First Request for Information.

Provide an original and three (3) copies of your responses to:

Public Utility Commission of Texas
Attention: Filing Clerk
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

2016 JAN 19 PM 1:15
PUBLIC UTILITY COMMISSION
FILING CLERK

Date: January 19, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director
Legal Division

Stephen Mack
Managing Attorney
Legal Division



Sam Chang
Attorney, Legal Division
State Bar No. 24078333

(512) 936-7261
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
sam.chang@puc.texas.gov

DOCKET NO. 45283

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on January 19, 2016, in accordance with 16 Tex. Admin. Code § 22.74.



Sam Chang

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 1-1 THROUGH NO. 1-28**

INSTRUCTIONS

1. Responses and any Document production shall be limited to the information available to North San Saba WSC at the time the decision to increase rates.
2. North San Saba WSC's responses to Staff's 1st RFI shall be provided within the time limit provided by the presiding officer or, if the presiding officer has not provided a time limit, within twenty (20) days.
3. North San Saba WSC's responses to Staff's 1st RFI shall be in sufficient detail to fully present all of the relevant facts.
4. Each response must be made under oath and identify the person that prepared the response or the person under whose direct supervision the response was prepared. Additionally, each response must also identify the sponsoring witness, if any.
5. Copy the specific question or document request immediately above each response. With respect to the production of documents, indicate the specific document request(s) to which the documents are being produced.
6. North San Saba WSC has a continuing duty to supplement its responses to Staff's 1st RFI if it acquires information upon the basis of which it knows or should know that the response was incorrect or incomplete when made or though correct or complete when made, is materially incorrect or incomplete. North San Saba WSC shall amend its prior response within five (5) working days of acquiring the information.
7. If any responsive Document, Electronically Stored Information, or tangible item is withheld under any claim of privilege, provide a privilege log identifying each Document for which a privilege is claimed, together with the following information:
 - a. Date of the Document was created;
 - b. Subject matter of the Document; and
 - c. The basis upon which such privilege is claimed.
8. Electronically Stored Information and Documents in an electronic format shall be produced with metadata intact.
9. If the response to any request is voluminous, provide a detailed index of the voluminous material and the means by which Staff may obtain the voluminous material.
10. 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.

11. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
12. The terms “and” and “or” shall be construed as either conjunctive or conjunctive as necessary to make the request inclusive rather than exclusive
13. Documents produced in response to Staff’s 1st RFI shall be Bates labeled.

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 1-1 THROUGH NO. 1-28**

DEFINITIONS

1. "North San Saba WSC" means North San Saba Water Supply Corporation and any entity or person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, independent contractors, or other persons.
2. "Commission" means the Public Utility Commission of Texas.
3. "Document" is used in its broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description, whether printed, produced, or reproduced by any process (visually, magnetically, mechanically, electronically, or by hand); whether a final draft, initial draft, original copy, or reproduction; whether claimed as privileged or otherwise excludable from discovery; and whether or not in your actual or constructive possession, custody, or control. The term includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to Electronically Stored Information, correspondence, e-mails, telegrams, contracts, agreements, notes in any form, memoranda, reports, invoices, ledgers, spreadsheets, data, models, diaries, compilations, voice recording tapes, microfilms, pictures, computer media, workpapers, 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.
4. "Electronically Stored Information" means data that is created, altered, communicated, and stored in digital form.

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 1-1 THROUGH NO. 1-28**

STAFF RFI NO. 1-1	Provide all cost of service studies used or relied upon by North San Saba WSC to set the rates subject to this appeal.
STAFF RFI NO. 1-2	Provide a copy of all Documents used or relied upon by North San Saba WSC to set the rates subject to this appeal.
STAFF RFI NO. 1-3	Provide a copy of North San Saba WSC's minutes that approved the rates subject to this appeal.
STAFF RFI NO. 1-4	State the revenue requirement for the test year used to set the rates subject to this appeal.
STAFF RFI NO. 1-5	Provide a copy of all audited or unaudited financial statements used or relied upon by North San Saba WSC to set the rates subject to this appeal.
STAFF RFI NO. 1-6	Provide a copy of all budgets used or relied upon by North San Saba WSC to set the rates subject to this appeal.
STAFF RFI NO. 1-7	Provide a detailed general ledger of expenses that reconciles the revenue requirement for the test year.
STAFF RFI NO. 1-8	Provide a reconciliation between North San Saba WSC's historical financial statements and the revenue requirement for the test year.
STAFF RFI NO. 1-9	Provide a detailed general ledger of expenses that reconciles the financial statements for the test year.
STAFF RFI NO. 1-10	Provide a reconciliation between North San Saba WSC's budget and the revenue requirement for the test year.
STAFF RFI NO. 1-11	Provide copies of North San Saba WSC's federal income tax returns for the test year and for the two years prior to the test year. ¹
STAFF RFI NO. 1-12	Provide copies of North San Saba WSC's W-2 forms for employee salaries and 1099 forms for contract labor for the test year. ²

¹ Copies federal income tax returns should be provided confidentially.

² Such tax forms should be provided confidentially.

STAFF RFI NO. 1-13	State the amount of the regulatory assessment fee paid to Texas Commission on Environmental Quality. If the regulatory assessment fee is included in the statement of revenue and expense, state the expense category/account in which the regulatory assessment fee is included.
STAFF RFI NO. 1-14	Provide a detailed, fixed asset depreciation schedule that includes the original cost, date of installation, and service life for each asset.
STAFF RFI NO. 1-15	Provide total gallons produced and gallons billed usage data for 2014 and 2015 by month, customer class, and tier.
STAFF RFI NO. 1-16	Provide detailed invoices supporting any rate case expenses that North San Saba WSC intends to recover for this appeal. Invoices should include the name of the person providing the service, hourly billing rates, specific description of services performed during the time billed, and hours billed on each invoice.
STAFF RFI NO. 1-17	Provide Documents regarding the following expenses included in the revenue requirement: <ul style="list-style-type: none"> a. Repairs or maintenance supplies over \$1,000; b. Office expenses over \$500; c. All accounting and legal fees; d. All insurance; and e. Miscellaneous expenses.
STAFF RFI NO. 1-18	Provide all Documents that support the reasonableness of the rate case expenses incurred by North San Saba WSC for this appeal.
STAFF RFI NO. 1-19	Provide all Documents that support known and measurable changes from the test year.
STAFF RFI NO. 1-20	List all entities affiliated with North San Saba WSC.
STAFF RFI NO. 1-21	Provide all calculations for allocation of expenses and/or cost sharing between North San Saba WSC and its affiliates for the test year and one year prior to the test year.
STAFF RFI NO. 1-22	Provide all Documents that support the reasonableness of any transactions between North San Saba WSC and any affiliate.

- STAFF RFI
NO. 1-23** Provide all Documents that support the reasonableness and necessity of the salaries and contract labor expenses incurred by North San Saba WSC to provide water service.
- STAFF RFI
NO. 1-24** Provide a breakdown of the total revenues collected by North San Saba WSC for the test year. Include in this breakdown:
- a. The revenues collected for base charges;
 - b. The revenues collected for gallonage charges for water service;
 - c. Late fees;
 - d. Connection fees; and
 - e. Any other revenues.
- STAFF RFI
NO. 1-25** Provide a copy of North San Saba WSC's current tariff.
- STAFF RFI
NO. 1-26** Provide North San Saba WSC's depreciation schedule in Excel format.
- STAFF RFI
NO. 1-27** Provide North San Saba WSC's rate design in Excel Format.
- STAFF RFI
NO. 1-28** Provide customer usage and amounts billed to customers.³

³ This information should be provided confidentially.