



Control Number: 45283



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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**
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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 2-1 THROUGH NO. 2-15**

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 Commission Staff's Second 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

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Date: February 29, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director
Legal Division

Stephen Mack
Managing Attorney
Legal Division



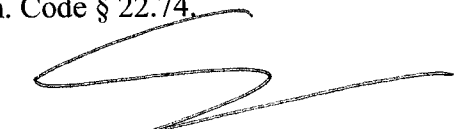
Sam Chang
Attorney, Legal Division
State Bar No. 24078333

(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

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on February 29, 2016, in accordance with 16 Tex. Admin. Code § 22.74.


Sam Chang

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 2-1 THROUGH NO. 2-15**

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 2nd 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 2nd 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 2nd 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 2nd RFI shall be Bates labeled.

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 2-1 THROUGH NO. 2-15**

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 SECOND REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 2-1 THROUGH NO. 2-15**

- STAFF RFI
NO. 2-1** Provide an official, approved copy of the North San Saba WSC board minutes that approved the rate change.
- STAFF RFI
NO. 2-2** Provide an electronic copy (in Microsoft Excel format) of a detailed general ledger for fiscal year 2014 based on an annual run containing account balances and transaction entries.
- STAFF RFI
NO. 2-3** Provide a Microsoft Excel spreadsheet reconciling the general ledger account balances for fiscal year 2014 to the audited financial statement amounts for fiscal year 2014 and the tax return amounts for fiscal year 2014.
- STAFF RFI
NO. 2-4** Provide a detailed listing of expenditures and any related calculations included in the revenue requirement amount of \$355,347 in document NSSWWSC 000003.
- STAFF RFI
NO. 2-5** Provide a reconciliation of the revenue requirement of \$355,347 with the monthly revenue amount of \$34,032 in NSSWWSC 000307-000327 and an explanation of how this amount is reasonable based on expenditures necessary for provision of water utility services
- STAFF RFI
NO. 2-6** Provide a copy of all approved debt service instruments (bond issuance documents, promissory notes, or other origination documents for North San Saba WSC) for debt outstanding at the beginning and end of 2014 related to the water service provided to ratepayers.
- STAFF RFI
NO. 2-7** Provide a copy of the amortization schedules or annual payment schedule for each outstanding debt of North San Saba WSC related to water service provided to ratepayers.
- STAFF RFI
NO. 2-8** Provide a copy of any approved future debt and related amortization schedules of North San Saba WSC that were approved by the board of directors at the time the decision to raise rates was made.
- STAFF RFI
NO. 2-9** Provide the minutes of the board of directors approving any future debt issuances
- STAFF RFI
NO. 2-10** Provide a listing of the fixed assets in the tax return depreciation schedule for fiscal year 2014.

- STAFF RFI
NO. 2-11** Provide a list of assets that was paid by debt that is currently being serviced by North San Saba WSC.
- STAFF RFI
NO. 2-12** Provide Documents that support the reasonableness of salaries and contract labor expenses for providing water service.
- STAFF RFI
NO. 2-13** Provide a list of North San Saba WSC's list of employees and contract labor personnel, amounts paid, and specific duties and responsibilities for each person listed.
- STAFF RFI
NO. 2-14** Explain the inconsistency between the life spans (recovery period) across common asset group descriptions.
- STAFF RFI
NO. 2-15** Provide all invoices and receipts for any items installed from 2008 to the present.