



Control Number: 45283



Item Number: 25

Addendum StartPage: 0

**SOAH DOCKET NO. 473-16-1834.WS
PUC DOCKET NO. 45283**

RECEIVED

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

§
§
§
§

**STATE OFFICE OF
ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 4-1**

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 Fourth 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

25

Date: April 4, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director
Legal Division

Stephen Mack
Managing Attorney
Legal Division



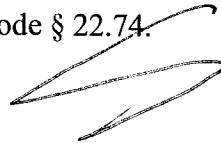
Sam Chang
Attorney, Legal Division
State Bar No. 24078333

(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 April 4, 2016, in accordance with 16 Tex. Admin. Code § 22.74.



Sam Chang

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 4-1**

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 4th 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 4th 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 4th 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 4th RFI shall be Bates labeled.

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 4-1**

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 FOURTH REQUEST FOR INFORMATION TO
NORTH SAN SABA WATER SUPPLY CORPORATION
STAFF NO. 4-1**

STAFF RFI State whether North San Saba WSC used the cash method or the utility
NO. 4-1 method to determine its revenue requirement.