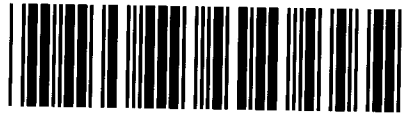




Control Number: 45283



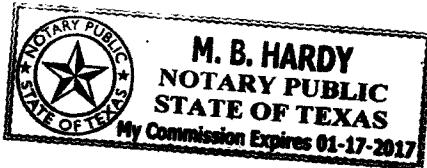
Item Number: 38

Addendum StartPage: 0

45283

Barbara Horn

SUBSCRIBED AND SWORN TO this 13th day of May, 2016



M B Hardy

Notary Public in and for

The State of Texas

RECEIVED
2016 MAY 17 PM 12:09
PUBLIC UTILITY COMMISSION
FILING CLERK

Respectfully submitted,

Barbara Horn
Barbara Horn, *Pro se*

P. U. C. T. DOCKET NO. 45283

SOAH DOCKET NO. 473-16-1834.WS

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

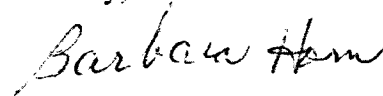
PUBLIC UTILITY COMMISSION OF TEXAS

**PROTESTANT BARBARA HORNS RESPONSE TO NORTH
SAN SABA WATER SUPPLY CORPORATIONS First Request
for Information**

To: Richard T. Miller, 414 E. Wallace Street, San Saba, TX 76877

The responses to North San Saba Water Supply Corporation's First Request for Information are supplied in the following pages.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Horn".

Barbara Horn
7255 County 124
San Saba. TX 76877

Protestant Barbra Horns Response to North San Saba Water Supply Corporations First Request for Information

No. 1-1 Please identify any facts and/or documents upon which you base any allegation that the rate increase at issue in this appeal is unreasonable.

Response: All documents and facts used to show that this rate increase is unreasonable can be found in Barbara Horn's Pre-filed testimony, Topic 1.

No. 1-2 Please identify alternative rates you believe would be reasonable and include any facts and documents supporting your belief.

Response: I did not do any calculations to determine rates that I believe to be reasonable.

No. 1-3 Please identify any strategy you suggest would allow NSSWSC to service its current debt and maintain efficient operation of water service without increasing the water rates.

Response: I did not prepare a strategy that would allow NSSWSC to service its current debt and maintain system operations without a rate increase.

No. 1-4 Please identify what actions you suggest NSSWSC take in order to maintain 24/7 water system maintenance outside of its contract with Will Broyles and provide an estimate of that cost, including equipment, from some one with a Class C operator's license.

Response: The first action regarding NSSWSC's system maintenance should be to hire an employee as operator. Judging from what is shown in **Response No. 1-4R1**, an operator could likely be hired for approximately \$30,000. An operator hired at this salary would likely have a Class C license or higher. Will Broyles did not have a Class C License when awarded the contract in 2010. He was given an 18 month exception by Texas Commission on Environmental Quality. See **Response 1-4R2**. For a cost estimate, please see **Response No. 1-4R3**.

No. 1-5 Please identify what actions you suggest NSSWSC take in order to handle office operations for NSSWSC and provide an estimate of that cost.

Response: The actions I suggest NSSWSC take in order to handle office operations would be to hire an office manager, rent office space in the City of San Saba, purchase the required furniture and equipment. Please refer to **Response No. 1-5** for a cost estimate.

No. 1-6 Please identify what actions you suggest NSSWSC take in order to minimize its current office or administrative expenses.

Response: Please refer to **Response No. 1-5** for actions to minimize office or Administrative expenses.

No. 1-7 Please identify what information concerning NSSWSC's new rates that you verbally communicated to NSSWSC members when circulating the petition for appeal.

Response: I do not recall.

No. 1-8 Please identify what information concerning NSSWSC's contract with Will Broyles you verbally communicated to NSSWSC members when circulating the petition for appeal.

Response: I do not recall.

No. 1-9 Please identify what information concerning NSSWSC's office/administrative or other expenses you verbally communicated to NSSWSC members when circulating the petition for appeal.

Response: I do not recall.

No. 1-10 Please identify reasons why none of the petitioners have sought to serve on the NSSWSC Board of Directors and indicate whether or not that demonstrates the Rate Payers confidence in the effectiveness of the current and past Boards of Directors.

Response: Several petitioners have served on the NSSWSC Board of Directors. Those petitioners are Worth Isham, Jeff McIntosh, Mike Ivy, and Jan Huffstetler.

No. 1-11 On January 11, 2016, the parties were directed by the PUC to provide by January 26, 2016 a list of issues to be addressed in this matter. In light of the fact that the Rate Payers have not yet filed a list, please identify the issues that you wish to be considered in this proceeding.

Response: For a list of issues I would like to be considered in this proceeding, please see **Response No. 1-11**.

Millersview-Doole WSC

hr.
/68/ per mon.
yearly

✓ Vincent Bednar	<u>12-2011</u>	Field Hand	\$14.55	\$ 29,333
✓ Rebecca Bowen	<u>7-2015</u>	Meter Reader & (Plant Operator)	\$10.50	\$ 21,168
✓ Wade Halfmann	<u>3-2015</u>	Field Hand	\$10.50	\$ 21,168
✓ Karon McNaley	<u>7-2013</u>	Accounts & (Plant Operator)	\$11.25	\$ 22,680
✓ Raymond Meek	<u>5-2015</u>	Plant Operator	\$10.50	\$ 21,168
✓ Curtis Shipmen	<u>1-2016</u>	Field Hand	\$10.50	\$ 21,168
Tonya Williams	<u>8-2012</u>	Billing	\$11.50	\$ 23,184
✓ Marcus Wright	<u>6-2014</u>	Field Hand	\$12.25	\$ 24,696

Field Hands \$ 21,168 - \$ 29,333 ^{Most Exp.}

February 3, 2010

Our Engineer, Deana Sealy, secured an exception for our Operator's license requirements from TCEQ.

The previous requirement was that our operator had to have a class C ground water license. Now our operator can have a class D water license, as long as it is elevated to a class C ground water license within 18 months.

NOTE—This is contingent on NSSWSC receiving a letter from TCEQ stating this exception.

The reason for this exception is to save NSSWSC a considerable amount of money because we can now take bids from contractors with a class D license.

Response No. 7-4R2

Field Employee Expenses						
Operator/Manager/Field Employee						
			overtime		With	
hrs/mon	wage	pay/mon	pay/mon	pay/yr	fica&ins	
168	\$ 13.50	\$ 2,268	120	\$ 28,656	1.08	\$ 30,948
Occasional help						\$ 3,000
Insurance						
	Liability		\$ 100		\$	1,200
	Health		\$ 150		\$	1,800
One employee - Total Estimated Cost						\$ 36,948

Response No. 1-4R3-1

Equipment		Frequency years		Cost per Year
Pickup		5	\$ 20,000	\$ 4,000
		Annual Mileage	Cost per mile	
Annual Mileage Cost		20,000	\$ 0.32 *	\$ 6,400.00
		Frequency		
Trailer	Buy a trailer	20 yrs	\$ 1,000	\$ 50
	Maintenance			\$ 50
Backhoe	Buy a Backhoe	10 yrs	\$ 25,000	\$ 2,500
	Maintenance			\$ 500
	Annual Fuel/oil			\$ 500
Miscellaneous Equipment				\$ 500
Estimated Annual Field Equipment Cost				\$ 14,500
* Include - Insurance, Fuel/oil, License, Maintenance				
TOTAL COST - FIELD OPERATIONS				\$ 51,448

Office Expenses						
		Sq FT.	\$/Sq. Ft.	Cost	Monthly	Yearly
Office Space		315	0.75	\$ 236	\$ 236	\$ 2,835
		Cost			Over	
Furniture	Number	each		Total	5 Years	
Chairs	2	90		\$ 180		
Desk	1	300		\$ 300		
table	1	50		\$ 50		
Cabinet	2	120		\$ 240		
				\$ 770	\$ 154	\$ 13 \$ 154
Equipment	Quantity	Cost ea.				
Computers	1	\$ 400		\$ 80		\$ 80
Printer	1	\$ 450		\$ 90		\$ 90
Software	2	\$ 200		\$ 80		\$ 80
Utilities	Telephone			\$ 20.00		\$ 240
	Internet			\$ 35.00		\$ 420
	Cell			\$ 70.00		\$ 840
					Yearly =	\$ 1,904
Office Personnel						
Employee	Hr/Mon	Wage	\$/Mon	\$/Year	1.08 FICA, etc	
1	168	\$ 8.50	\$ 1,428.00	\$ 17,136	\$ 18,506.88	\$ 17,136
Insurance						
	Health	\$ 160				\$ 1,920
	Liability	\$ 80				\$ 960
					Employee 1	Yearly = \$ 20,016
						Total = \$ 24,755
TOTAL COST (Office w/ employee, Field Operation w/ employee)						\$ 71,464

Response No. 1-5

Issues for North San Saba Water Supply (NSSWSC) Rate Appeal

P.U.C.T. Docket No. 45283

SOAH Docket No. 473-16-1834.WS

- 1 The unfair and unreasonable rate increase as detailed NSSWSC letter of July15, 2015.
- 2 Error in Rate Design performed by TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) in 2009.
- 3 NSSWSC letter of July 17, 2016 with table of Example Bills
- 4 Errors in monthly Water Report for 2016
- 5 NSSWSC Cost Projections
- 6 Violations cited by TCEQ
- 7 Mrs. Barbara Horn's request for information
- 8 Operator's Position