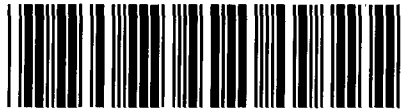




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PUBLIC UTILITY COMMISSION  
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|                                |   |                         |
|--------------------------------|---|-------------------------|
| REVIEW OF THE RATES OF         | § | BEFORE THE STATE OFFICE |
| SHARYLAND UTILITIES, L.P.,     | § |                         |
| ESTABLISHMENT OF RATES FOR     | § |                         |
| SHARYLAND DISTRIBUTION &       | § |                         |
| TRANSMISSION SERVICES, L.L.C., | § | OF                      |
| AND REQUEST FOR GRANT OF A     | § |                         |
| CERTIFICATE OF CONVENIENCE     | § |                         |
| AND NECESSITY AND TRANSFER OF  | § |                         |
| CERTIFICATE RIGHTS             | § | ADMINISTRATIVE HEARINGS |

**FIFTH REQUEST FOR INFORMATION  
OF THE CITIES OF MIDLAND, McALLEN, AND COLORADO CITY  
TO SHARYLAND UTILITIES, L.P.**

The Cities of Midland, McAllen, and Colorado City ("Cities") files its Fifth Request for Information ("RFI") to Sharyland Utilities L.P. ("Sharyland" or "Company") in the above-styled docket. Sharyland is hereby requested to furnish one copy of all items of information enumerated on the attached pages directly to the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701, the undersigned attorney, within twenty (20) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if Sharyland receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

**DEFINITIONS AND INSTRUCTIONS**

A. 'Sharyland Utilities L.P.' or 'Sharyland' or other corporate or partnership entities refers to its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The term 'document' shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations,

messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper documents is a separate document within the meaning of this term.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Cities specifically requests that any electronic or magnetic data (which is included in the definition of 'document') that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. Cities further requests that Sharyland produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms 'and' and 'or' shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. 'Each' shall be construed to include the word 'every' and 'every' shall be construed to include the word 'each.'

F. 'Any' shall be construed to include 'all' and 'all' shall be construed to include 'any.'

G. The term 'concerning,' or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

II. The term 'including,' or one of its inflections, means and refers to 'including but not limited to.'

I. 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.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

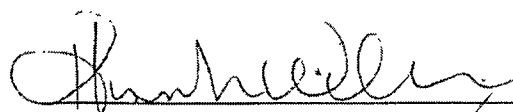
K. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

L. Pursuant to 16 Tex. Admin. Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,

**LLOYD GOSSELINK**  
**ROCHELLE & TOWNSEND, P.C.**  
816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
Telephone: (512) 322-5800  
Facsimile: (512) 472-0532



GEOFFREY M. GAY  
State Bar No. 07774300  
[gmg@lglawfirm.com](mailto:gmg@lglawfirm.com)

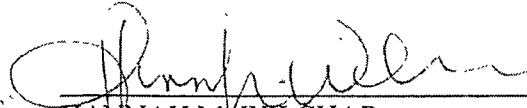
*w/permission*

WILLIAM A. FAULK, III  
State Bar No. 24075674  
[cfaulk@lglawfirm.com](mailto:cfaulk@lglawfirm.com)

ATTORNEYS FOR THE CITIES OF MIDLAND,  
MCALLEN, AND COLORADO CITY

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of February 2017, a true and correct copy of the foregoing document was served on all parties of record in accordance with SOAH Order No. 2.

  
HANNAH M. WILCHAR

**SOAH DOCKET NO. 473-16-4051  
PUC DOCKET NO. 45414**

**Cities' Fifth RFI to Sharyland**

- Cities 5-1. Please refer to Schedules II-E-3.5 line 19 and II-E-3.6 line 10 in the SDTS RFP related to the ADFIT item described as "Initial GAAP Deferral."
- a. Please confirm or deny that this ADFIT balance is solely related to the Docket No. 21591 Deferral Balance of \$30,000,000. If denied, please explain why.
  - b. Please describe the derivation of the per books balance of \$8,327,555 in ADFIT in column 1 as of the end of the test year. As part of the description, please provide all computations of the temporary difference, a copy of all source documents applicable to the temporary difference, the tax rate applied, and the computations of the ADFIT balance determination.
  - c. Please describe the derivation of the pro forma adjustment of (\$832,755) in ADFIT in column 2 as of the end of the test year. As part of the description, please provide all computations of the temporary difference, a copy of all source documents applicable to the temporary difference, the tax rate applied, and the computations of the ADFIT balance determination.
  - d. Please describe the derivation of the pro forma adjustment of \$7,494,799 in ADFIT in column 3 as of the end of the test year. As part of the description, please provide all computations of the temporary difference, a copy of all source documents applicable to the temporary difference, the tax rate applied, and the computations of the ADFIT balance determination.
  - e. Please explain all reasons why the ADFIT balance as of the end of the test year is not \$10,500,000, which amounts to the Docket No. 21591 Deferral Balance of \$30,000,000 times the federal income tax rate of 35%.