



Control Number: 45550



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DOCKET NO. 45550

**APPLICATION OF DEER CREEK
RANCH WATER COMPANY FOR A
WATER PASS-THROUGH RATE
CHANGE**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO DEER CREEK RANCH WATER COMPANY
QUESTION NOS. STAFF 2-1 THOUGHT STAFF 2-9**

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that Deer Creek Ranch Water Company by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78712-3326.

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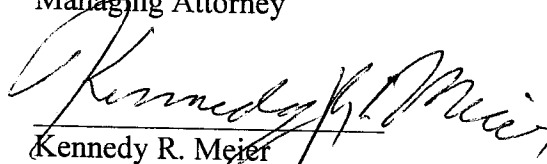
Dated: June 15, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Katherine Lengieza Gross
Managing Attorney

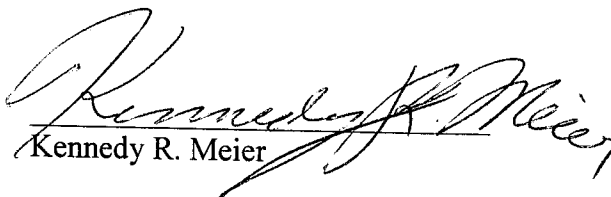


Kennedy R. Meier
State Bar No. 24092819
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7265
(512) 936-7268 (facsimile)

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on June 15, 2016, in accordance with 16 TAC § 22.74.



Kennedy R. Meier

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO DEER CREEK RANCH WATER COMPANY
QUESTION NOS. STAFF 2-1 THOUGHT STAFF 2-9**

DEFINITIONS

- A. "Deer Creek" or "you" refers to the Deer Creek Ranch Water Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, 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. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO DEER CREEK RANCH WATER COMPANY
QUESTION NOS. STAFF 2-1 THOUGHT STAFF 2-9**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) 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.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) 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.
- 7) Pursuant to 16 TAC § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO DEER CREEK RANCH WATER COMPANY
QUESTION NOS. STAFF 2-1 THOUGHT STAFF 2-9**

- Staff 2-1** Please Provide a billing register for each and every month for the period starting January 2015 and ending January 2016. For the purposes of these requests for information, a billing register means the documents summarizing the monthly billing of the utility, including but not limited to, total charges billed broken down by type of charge (e.g., base rate, gallonage rate, pass through charges, late fees, etc.), a list of individual accounts billed by account number (names may be redacted), and the prior month's ending receivables, account balances written off, total payments received, account adjustments, gallonage usage information, and individual account balance information.
- Staff 2-2** For each category of information included in the billing register provided in response to Staff 2-1, please provide a total for that category for the calendar year 2015 unless the information is an account number or other type of information that is used solely to identify account holders.
- Staff 2-3** Please provide a copy of an actual full bill from one of Deer Creek's typical customers, redacting private information such as account number, name, or address, for each and every month for the period starting January 2015 and ending May 2016. The bill should include a breakdown of charges, including separate pass through charges, showing how each pass-through fee is being charged to the customer per Deer Creek's tariff (ex. WTCPUA/LCRA usage, WTCPUA annual fee, and LCRA reservation fee true-up).
- Staff 2-4** Please provide the LCRA bills to Deer Creek for the following periods:
- a) 8/15/2015 – 9/15/2015;
 - b) 11/15/2015 – 12/15/2015;
 - c) 12/15/2015 – 1/15/2016;
 - d) 1/15/2016 – 2/15/2016;
 - e) 2/15/2016 – 3/15/2016;
 - f) 3/15/2016 – 4/15/2016; and,
 - g) 4/15/2016 – 5/15/2016.
- Staff 2-5** Please provide the WTCPUA bills to Deer Creek for the following periods:
- a) 12/15/2015 – 1/15/2016;
 - b) 1/15/2016 – 2/15/2016;
 - c) 2/15/2016 – 3/15/2016;
 - d) 3/15/2016 – 4/15/2016; and,
 - e) 4/15/2016 – 5/15/2016.

- Staff 2-6** Please provide the “total number of active customers” for the beginning of each month or the “number of accounts at the beginning of the monthly billing cycle” for each and every month in the period beginning January 2015 and ending May 2016.
- Staff 2-7** Please provide documentation from the WTCPUA in the form of a contract or bill showing that Deer Creek is being charged an Annual Fee of \$50,000 (previously indicated as the LCRA reservation fee on Deer Creek’s tariff), including how that fee is billed to Deer Creek (monthly, annually, etc.).
- Staff 2-8** Please provide documentation that Deer Creek has paid the Annual Fee of \$50,000 referenced in the previous request for information in 2016, 2015 and 2014.
- Staff 2-9** Please provide a copy of all contracts currently in effect for purchased water, wholesale water, or water rights with LCRA and WTCPUA which have not been previously provided and to which Deer Creek is a party. If a contract has been amended since it was last filed with the Commission, please provide a copy of the amendment.