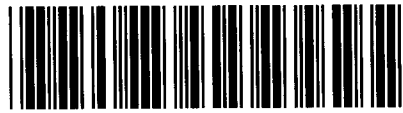




Control Number: 45570



Item Number: 110

Addendum StartPage: 0

SOAH DOCKET NO. 473-16-2873.WS  
PUC DOCKET NO. 45570

RECEIVED

APPLICATION OF MONARCH  
UTILITIES I, LP FOR AUTHORITY TO  
CHANGE RATES §  
§  
§

STATE OFFICE OF  
PUBLIC UTILITY COMMISSION  
ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S FOURTH REQUEST  
FOR INFORMATION TO MONARCH UTILITIES I, LP  
STAFF NOS. 4-1 THROUGH NO. 4-6

To: Monarch Utilities I, LP, through its counsel of record, Lambeth Townsend, Georgia N. Crump, and William A. Faulk, III, Lloyd, Gosselink, Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701

Pursuant to 16 Tex. Admin. Code § 22.144, Commission Staff of the Public Utility Commission of Texas requests that Monarch Utilities I, LP provide responses and produce documents in response to Staff's Third Request for Information.

Provide an original and three (3) copies of your responses to:

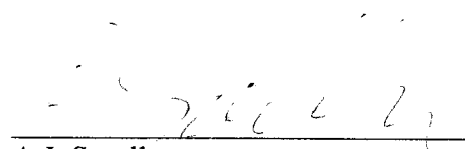
Public Utility Commission of Texas  
Attention: Filing Clerk  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78712-3326

Date: April 8, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director  
Legal Division

Stephen Mack  
Managing Attorney  
Legal Division

  
A.J. Smullen  
State Bar No. 24083881  
Attorney, Legal Division  
aj.smullen@puc.texas.gov

Sam Chang  
State Bar No. 24078333  
Attorney, Legal Division  
sam.chang@puc.texas.gov

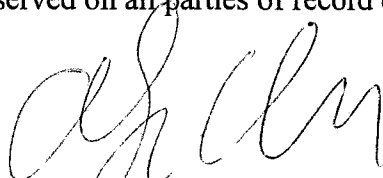
Public Utility Commission of Texas  
1701 N. Congress Avenue  
Austin, Texas 78712-3326  
(512) 936-7289  
(512) 936-7268 (facsimile)  
sam.chang@puc.texas.gov

*Commission Staff of the Public Utility  
Commission of Texas*

**SOAH DOCKET NO. 473-16-2873.WS  
PUC DOCKET NO. 45570**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties of record on April 8, 2016  
in accordance with 16 Tex. Admin. Code § 22.74.

  
\_\_\_\_\_  
AJ Smullen

**SOAH DOCKET NO. 473-16-2873.WS  
PUC DOCKET NO. 45570**

**COMMISSION STAFF'S FOURTH REQUEST  
FOR INFORMATION TO MONARCH UTILITIES I, LP  
STAFF NOS. 4-1 THROUGH NO. 4-6**

**INSTRUCTIONS**

1. Monarch Utilities' 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.
2. Monarch Utilities' responses to Staff's 4th RFI shall be in sufficient detail to fully present all of the relevant facts.
3. 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.
4. 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.
5. Monarch Utilities 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. Monarch Utilities shall amend its prior response within five (5) working days of acquiring the information.
6. 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.
7. Electronically Stored Information and Documents in an electronic format shall be produced with metadata intact.
8. 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.
9. 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.

10. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
11. The terms “and” and “or” shall be construed as either conjunctive or conjunctive as necessary to make the request inclusive rather than exclusive
12. Documents produced in response to Staff’s 4th RFI shall be Bates labeled.

**SOAH DOCKET NO. 473-16-2873.WS  
PUC DOCKET NO. 45570**

**COMMISSION STAFF'S FOURTH REQUEST  
FOR INFORMATION TO MONARCH UTILITIES I, LP  
STAFF NOS. 4-1 THROUGH NO. 4-6**

**DEFINITIONS**

1. "Monarch Utilities" means Monarch Utilities I, LP 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.
5. "NARUC" means the National Association of Regulatory Commissioners.

**SOAH DOCKET NO. 473-16-2873.WS**  
**PUC DOCKET NO. 45570**

**COMMISSION STAFF'S FOURTH REQUEST  
FOR INFORMATION TO MONARCH UTILITIES I, LP  
STAFF NOS. 4-1 THROUGH NO. 4-6**

- Staff 4-1 Please identify each component of invested capital for which all or part of the capitalized cost was charged by an affiliate. In identifying each component, please identify the respective affiliates, the costs attributable to each affiliate, and the proportion of such costs that comprise profit for the affiliate.
- Staff 4-2 See the direct testimony of Gary Rose at 10. Please provide
- a. the total gross plant that is the result of capitalizing the 30% margin charged by ECO Resources, Inc.,
  - b. the total accumulated depreciation associated with the plant responsive to item a., and
  - c. a breakdown of those totals by component of invested capital.
- Staff 4-3 Please provide an itemization by dollar value of the costs actually incurred by ECO Resources, Inc. that comprise the 30% margin charged by ECO Resources, Inc. to Monarch for each component of invested capital.
- Staff 4-4 Of the 30% margin charged by ECO Resources, Inc. to Monarch, please provide the amount for each capitalized project that represents the profit earned by ECO Resources, Inc.
- Staff 4-5 Please provide an itemization by dollar value of the costs actually incurred by ECO Resources, Inc. that comprise the 15% margin charged by ECO Resources, Inc. to non-affiliated entities.
- Staff 4-6 Of the 15% margin charged by ECO Resources, Inc. to non-affiliated entities, please provide the amount for each capitalized project that represents the profit earned by ECO Resources, Inc.