



Control Number: 45570



Item Number: 148

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SOAH DOCKET NO.473-16-2873.WS RECEIVED

PUC Docket No. 45570 2016 APR 28 AM 9: 22

Monarch I, L.'s Application : Public Utility Commission
To Change Water/Sewer Rates : of Texas

KATHY NIELSEN'S FIRST REQUESTS FOR INFORMATION TO MONARCH UTILITIES I, LP

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

Pursuant to 16 Tex. Admin. Code #22.144, Kathy Nielsen, Intervener, requests that Monarch Utilities I, LP, hereinafter "Monarch", provide responses and/or produce documents in response To Kathy Nielsen's First Requests For Information To Monarch Utilities I, LP.

Definitions:

1. "Monarch" to mean Monarch Utilities I, LP and including any subset of companies or incorporations which perform duties for Monarch Utilities I, LP and which are paid as subsidiaries of and/or by Monarch Utilities I, LP.
2. "You" in any form refers to Monarch (see above). You "have" in any form refers to Monarch's possession or ability to obtain possession.
3. "DOCUMENT": All written, printed, typed, recorded, stored or graphic matter of every kind and description, including without limitation, letters and other correspondence, contracts, telecopier transmissions, memoranda, reports, documentations previously submitted (to state commissions) in effort to request an increase in water and sewer fees, studies, maps, pamphlets, notes, charts, graphs, forms, tabulations, analyses, statistical or informational accumulations, summaries or abstracts, microfilm, paper and magnetic tapes, sound recordings, video tapes, films, photographs pictures, books, periodicals, computer cards, printouts, discs or input or memory which is statement, receipts, checks, time sheets, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, appointment calendars, recordings or oral conversations, work papers, observations, and personnel records which are in the actual or accessible possession, custody or control of Monarch; i.e. any instrument on which is recorded, by means of letters, figures or marks, the original, official, or legal form of something, which may be evidentially used in trial of this cause.

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4. "Application" to mean the Application Monarch submitted for the water and sewer rate price increases which is now the basis of this PUC Docket No. 45570.

Instructions:

1. Apply Definitions and these instructions in the responding to the following Requests for Information.
2. Furnish all information you have directly or which is in the possession of your agents, employees and representatives and all others from whom you can freely obtain it.
3. Copies of original documents, if submitted in response to these Requests, are satisfactory. Reference to any documents should contain a Bates number and/or a means by which anyone could readily find the reference indicated.
4. If any Request is confusing, please request clarification from the undersigned.
5. These Requests are continuing, if any change becomes evident, please supplement your response.
6. If you object to any Request, ie unduly burdensome or confidential privileged, please note the specific request and the specific objection and the specific basis for the objection in an email and contact undersigned as soon as possible.
7. Copy the specific request when responding.
8. Since Monarch's application for rate increase is based on their statement of approximately \$71 million allegedly spent between 2004 until today, the following requests should be interpreted as applying to the years 2004 until today.

Requests:

Requests No 1,2, and 3:

Provide information and/or indicate document title(s) and page number(s) where requested information can be found in your documents submitted in your Application which indicates for each of the following years: 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015:

- 1) The number of gallons of BILLED WATER usage to your customers,
- 2) the total income Monarch received from its billed customers, and
- 3) the number of gallons of NON-BILLED, waste water,

Request No. 4:

Provide information and/or indicate document title(s) and page number(s) where requested information can be found in your documents submitted in your Application which indicates that Monarch's "expenses" for operating your water systems have been kept separate from your "expenses" for operating your sewer systems, and not lumped together, or, to the contrary that you have lumped all water and septic expenses together in your accounting process.

Request No 5:

Provide information and/or indicate document title(s) and page number(s) where requested information can be found in your documents submitted in your Application which indicates what percent of your claimed \$71 dollars have been spent on water systems and what percent on septic systems.

Request No. 6:

Provide information and/or indicate document title(s) and page number(s) where requested information can be found in your documents submitted in your Application which indicates the name of any town, city, municipality, township, or group of residential units, or residential incorporation by any name in Texas which consists of approximately 23,000 customers and wherein the director of said water/sewer system makes in excess of \$300,000/year.

Request No. 7:

Provide information and/or indicate document title(s) and page number(s) where requested information can be found in your documents submitted in your Application which indicates that it is proper and/or legal that Monarch may and should increase its fees for residential customers using only 1000-2000 gallons/month a whopping 18% even though there was no increase in the cost of living(2016)(Social Security determination) ?

Request No. 8:

Provide information and/or indicate document title(s) and page number(s) where requested information can be found in your documents submitted in your Application which indicates the cost in dollars of the new, electronic water meters installed in your systems in Texas. (In answer to this question consider the meters themselves as well as all the costs associated with installation and repair of installation).

Request No. 9:

Provide information and/or indicate document title(s) and page number(s) where requested information can be found in your documents submitted in your Application which indicates that since you are looking to recoup your alleged expenditure of \$71 million with your requested increases in rates, what date you expect your \$71 million will be recouped, at which time the water and sewer rates will be dropped back down to the existing rates.

Request No. 10:

Provide information and/or indicate document title(s) and page number(s) where requested information can be found in your documents submitted in your Application which indicates how many of your customers use, on a yearly average, 2000 gallons of water or less.

Request No. 11:

For this Request , 'Profit' should be calculated to include, in dollars, "income" less "expenses". "Income" to be monies received from Monarch's customers. "Expenses" to be defined as operational costs of water and sewer systems EXCLUDING 1) salaries to Monarch executives, 2) Monarch legal costs other than business permits and the like, 3) the costs Monarch spent for purchasing and installing the new electronic "water meters", and 4) costs (if any) for "wasted" water (ie non-billed water spillage). "Executives" is defined to be any person who has collected monetary compensation in any form from Monarch worth in excess of \$80,000.

Provide information and/or indicate document title(s) and page number(s) where requested information can be found in your documents submitted in your Application which indicates profit in dollars made by Monarch for the following years: 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015.

Request No. 12:

Provide information and/or indicate document title(s) and page number(s) where requested information can be found in your documents submitted in your Application which indicates that Monarch's present application for water/sewer rate increases as based on \$71 million, INCLUDES a reduction for all the profits made by Monarch since 2004.

Respectfully submitted,



Kathy Nielsen
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Roanoke, TX 76262;
817.491.9788
Kn1277@gmail.com

Certificate of Service: I certify that copy of the above document was served on all parties of record on 4/26/16 by US Mail.

Kathy Nielsen