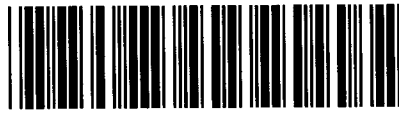


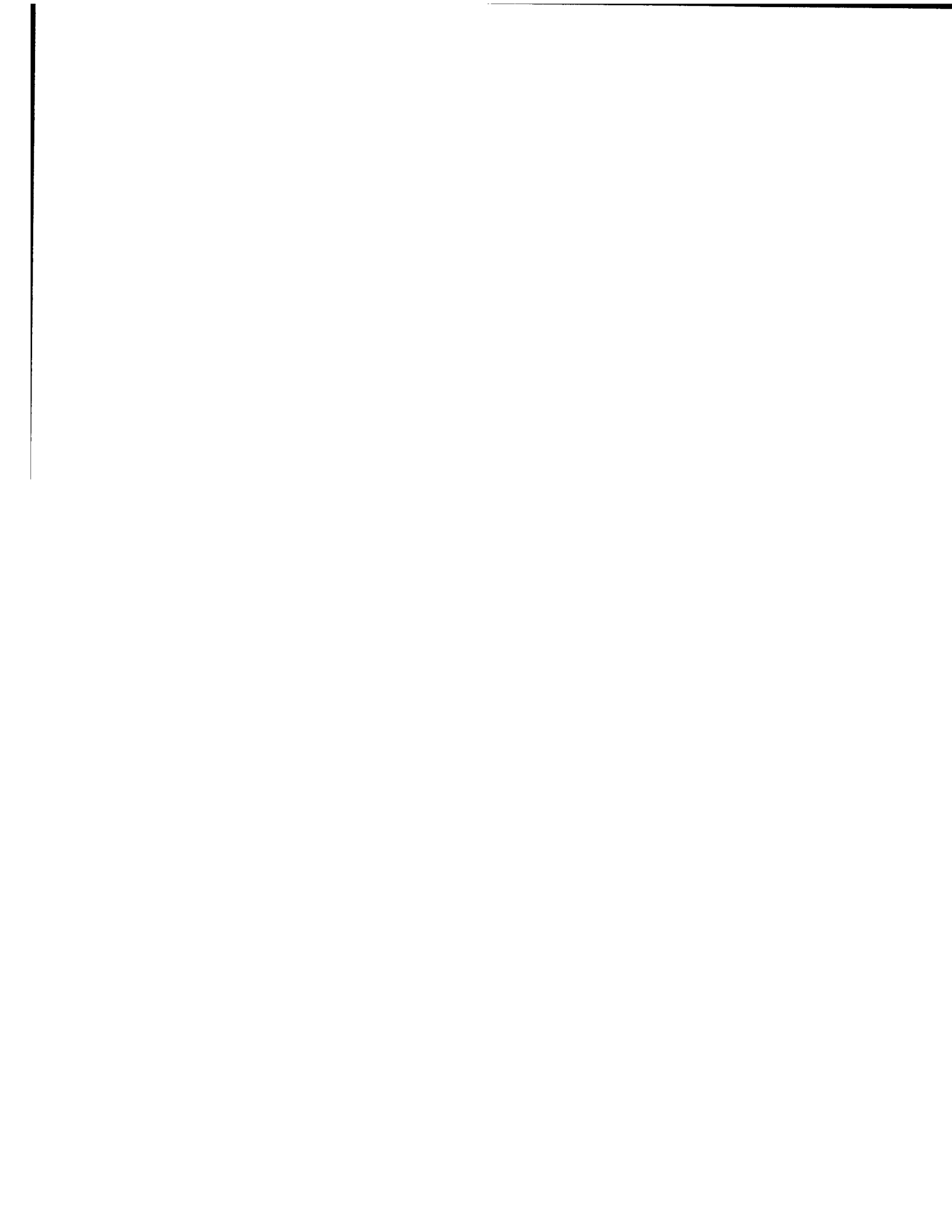


Control Number: 45570



Item Number: 155

Addendum StartPage: 0



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

RECEIVED  
2016 APR 29 PM 1:36

APPLICATION OF MONARCH UTILITIES I, L.P. TO CHANGE RATES FOR WATER AND SEWER SERVICE §  
§  
§ BEFORE THE STATE OFFICE OF PUBLIC UTILITY COMMISSION FILING CLERK ADMINISTRATIVE HEARINGS

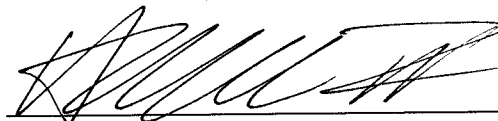
**MONARCH UTILITIES I, L.P.'S RESPONSES TO COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION**

To: Commission Staff, by and through its attorney of record, Sam Chang, Public Utility Commission of Texas, Legal Division, 1701 North Congress Avenue, Austin, Texas 78711-3326.

Monarch Utilities I, L.P. ("Monarch") files its Responses to Public Utility Commission ("Commission") Staff's Sixth Requests for Information received April 19 2016. This response is timely filed. This response may be treated by all parties as if it were filed under oath.

Respectfully submitted,

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



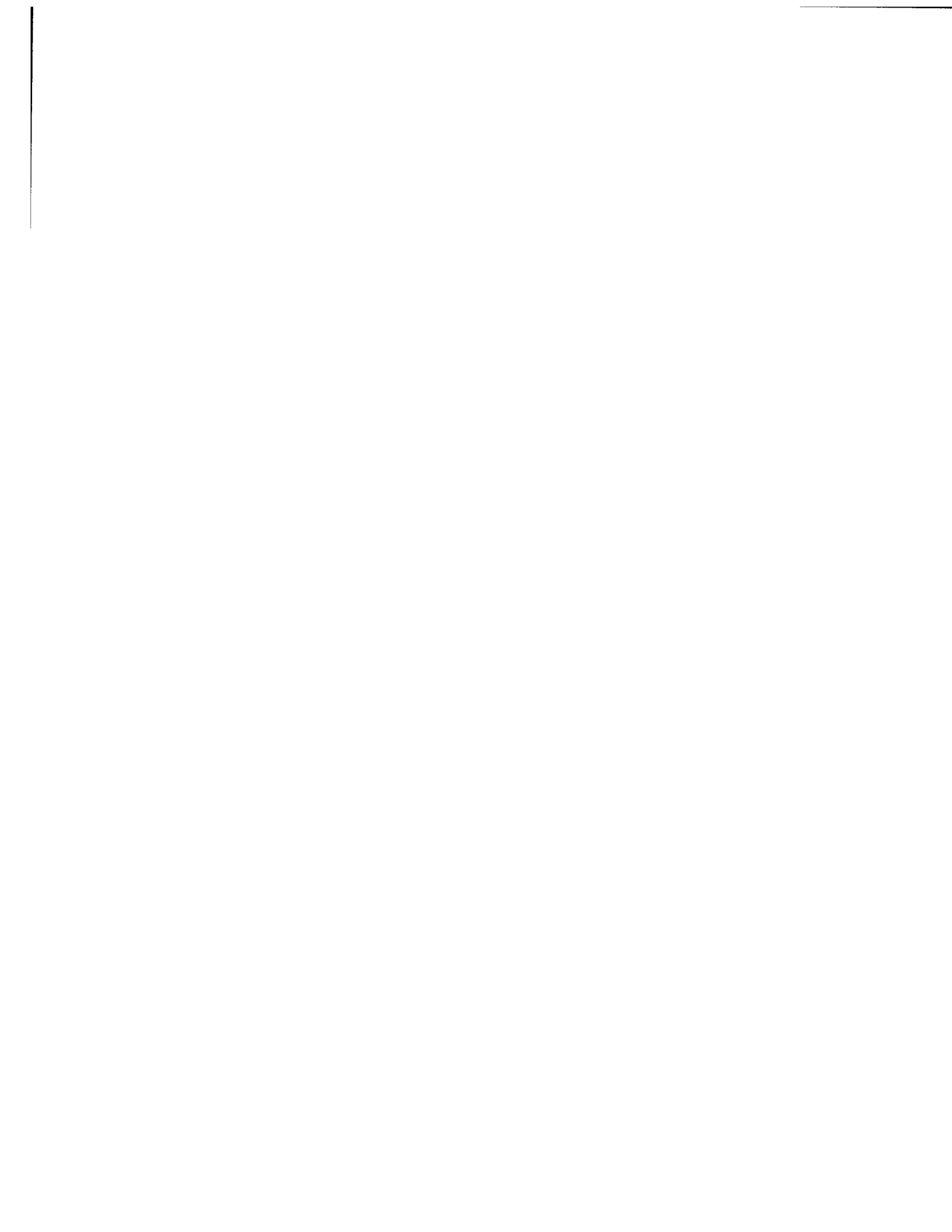
LAMBETH TOWNSEND  
State Bar No. 20167500  
ltownsend@lglawfirm.com

GEORGIA N. CRUMP  
State Bar No. 05185500  
gcrump@lglawfirm.com

WILLIAM A. FAULK, III  
State Bar No. 24075674  
cfaulk@lglawfirm.com

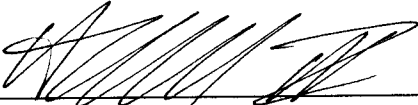
ATTORNEYS FOR MONARCH UTILITIES I, LP

155



**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of April, 2016, a true and correct copy of the foregoing document has been hand-delivered., sent via facsimile, e-mail, or first class mail to all parties of record.

  
\_\_\_\_\_  
WILLIAM A. FAULK, III



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

**MONARCH'S RESPONSES TO STAFF'S SIXTH REQUESTS FOR INFORMATION**

**STAFF RFI 6-1:**     **Reference Craig Gott's Entertainment /Business Meeting Expenses schedule under WP II-E-4.4. Please Identify the party referred to as TXU and explain the relevance the TXU rate case kick off meeting and tour has in the 2016 Monarch Utilities I, L.P. rate case.**

**RESPONSE:**       Monarch Utilities I, LP is a subsidiary of SouthWest Water Company ("SWWC"). Internally, SWWC refers to its Texas based operations, which includes Monarch, as Texas Utilities ("TXU"). Craig Gott's testimony erroneously refers to the TXU rate case when in fact intended to refer to the Monarch rate case.

Craig Gott works in SWWC's Suburban Water Systems ("SWS") operations based in Covina, CA. Craig Gott has extensive experience preparing rate case testimony and was selected by Monarch to prepare the capital testimony for the 2016 rate case application. The rate case kick off meeting and tour of Monarch's facilities was held from August 11, 2015 to August 13, 2015.

The initial meeting was held at the SWWC office in Sugar Land, TX on August 11, 2015. The purpose of this meeting was to scope, plan, schedule, and discuss resources for the preparation of the capital rate case testimony with the Regulatory, Accounting, Information Technology (IT), and Executive Management team.

Subsequent meetings were held at the Pflugerville, TX office on August 12, 2015 and Conroe, TX office on August 13, 2015 to plan and coordinate the preparation of the capital testimony with Monarch's Field Operations Management and Engineering team members. Between meetings Monarch's personnel took Craig on field tours to familiarize him with Monarch's water and wastewater facilities.

Prepared by:       Craig Gott  
Sponsored by:     Craig Gott





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

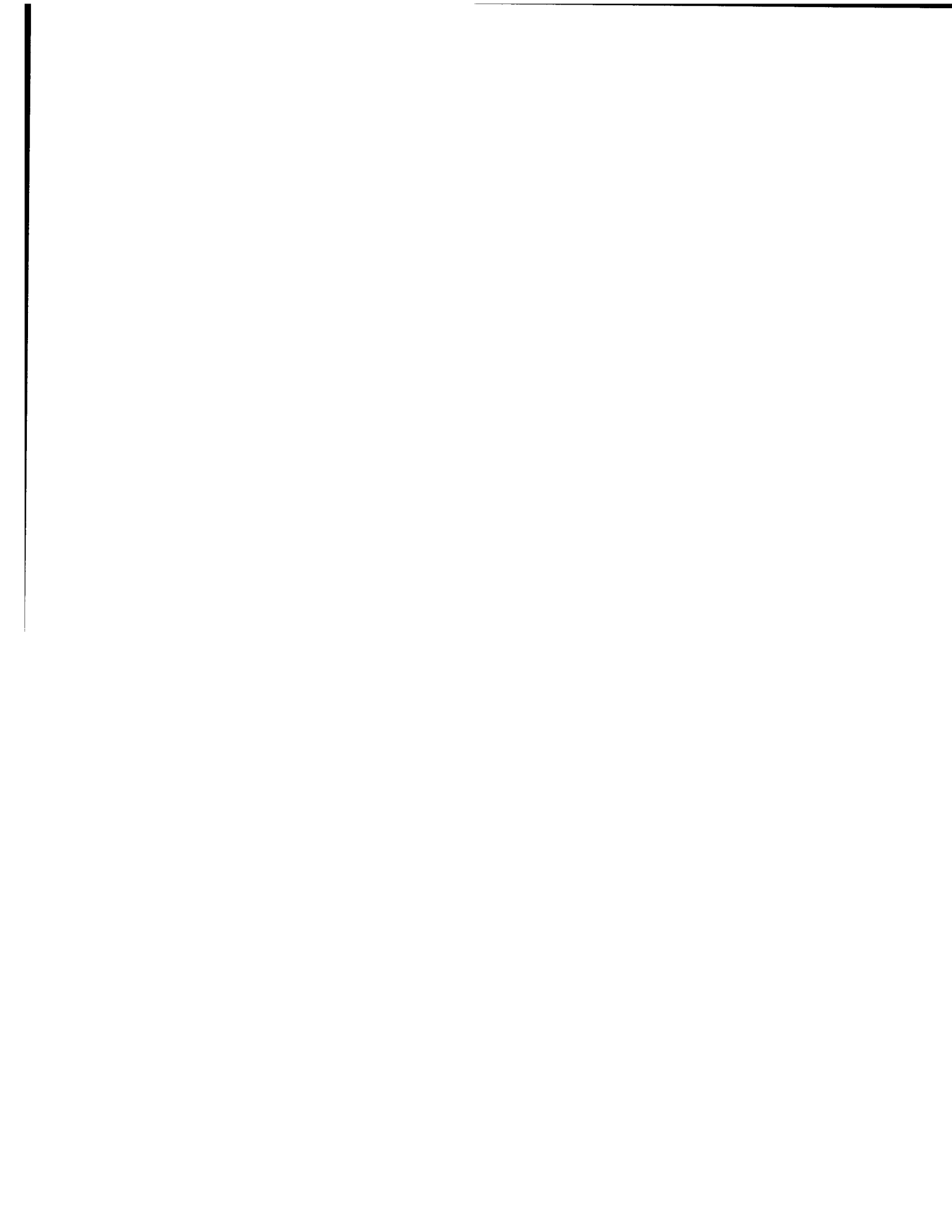
**MONARCH'S RESPONSES TO STAFF'S SIXTH REQUESTS FOR INFORMATION**

**STAFF RFI 6-2:**      **Reference George Freitag's expenses under WP II-E-4.4. Please explain the following:**

- a)      **How the telephone expenses incurred from the Sprint phone line ending in 4799 are relevant to and are reasonable and necessary for this proceeding.**
- b)      **How the expense for the Society of Depreciation Professionals, incurred September 21, 2015 are relevant to and are reasonable and necessary for this proceeding.**

**RESPONSE:**      Careful review of the Cost Center column on the Employee Expense Report, dated 11/2/2015 included in WP II-E-4.4 for George Freitag will show that the expenses for Sprint phone charges and training at the Society of Depreciation Accountants were coded to expense accounts other than Rate Case Expenses. Furthermore, the expenses were incurred outside the test year and were not included in this rate request proceeding.

Prepared by:      George Freitag  
Sponsored by:      George Freitag



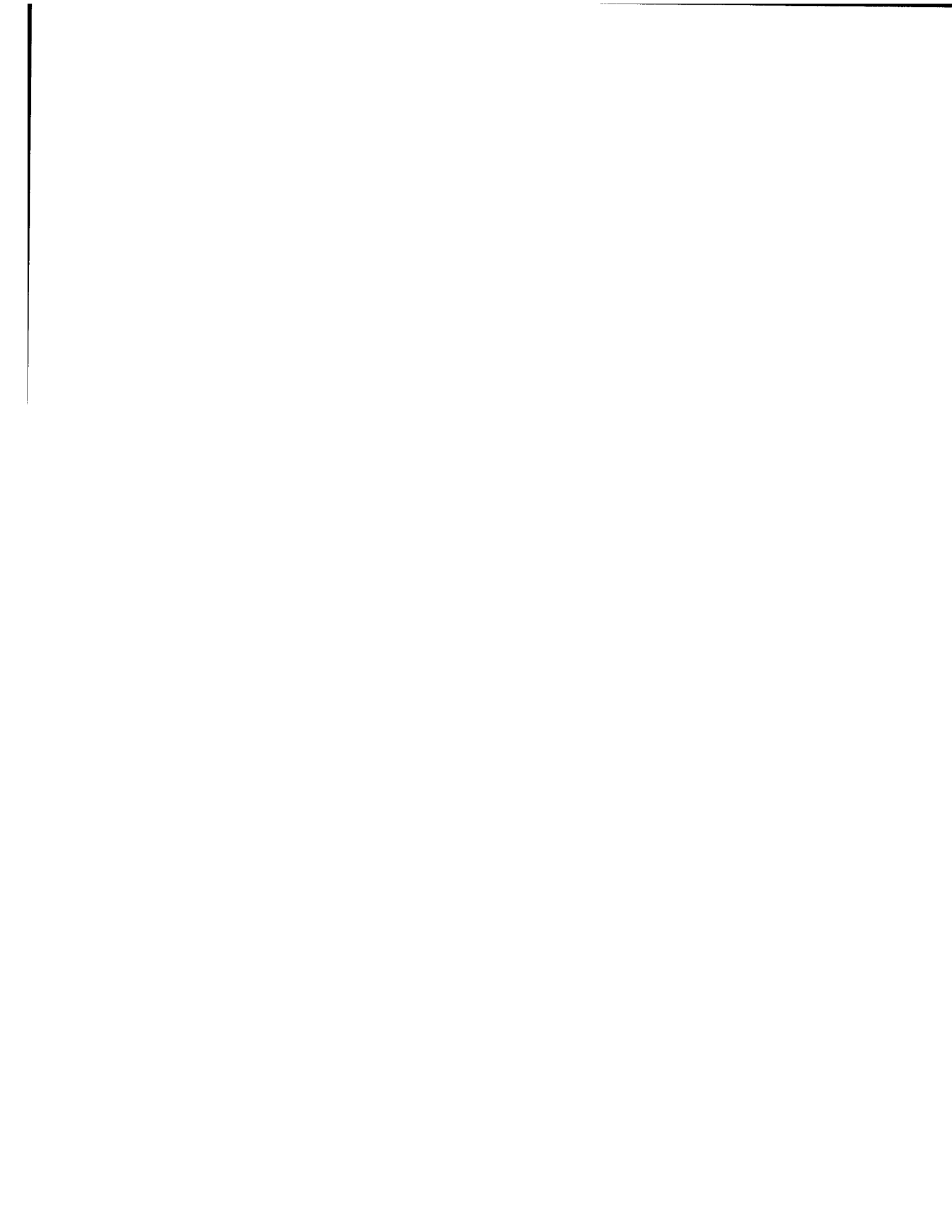
**PUC DOCKET NO. 45570  
SOAH DOCKET NO. 473-16-2873.WS**

**MONARCH'S RESPONSES TO STAFF'S SIXTH REQUESTS FOR INFORMATION**

**STAFF RFI 6-3:** Please provide the number of connections Monarch Utilities I, L.P. services as of the end of the period for which Monarch requests rate-case expenses associated with this proceeding. Please supplement your response to this question as needed, consistent with the Commission's rules.

**RESPONSE:** 24,455 connections as of March 2016.

Prepared by: George Freitag  
Sponsored by: George Freitag



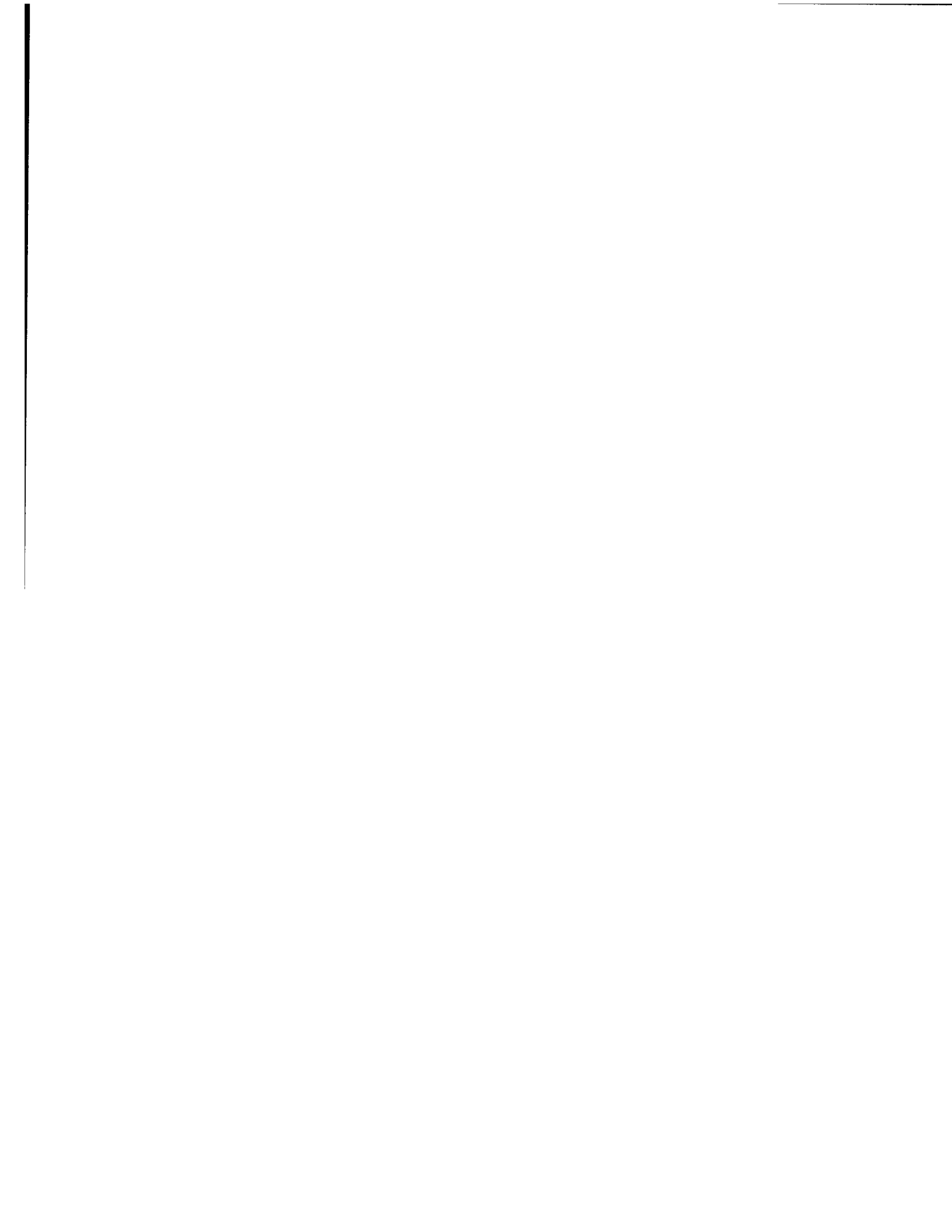
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SOAH DOCKET NO. 473-16-2873.WS**

**MONARCH'S RESPONSES TO STAFF'S SIXTH REQUESTS FOR INFORMATION**

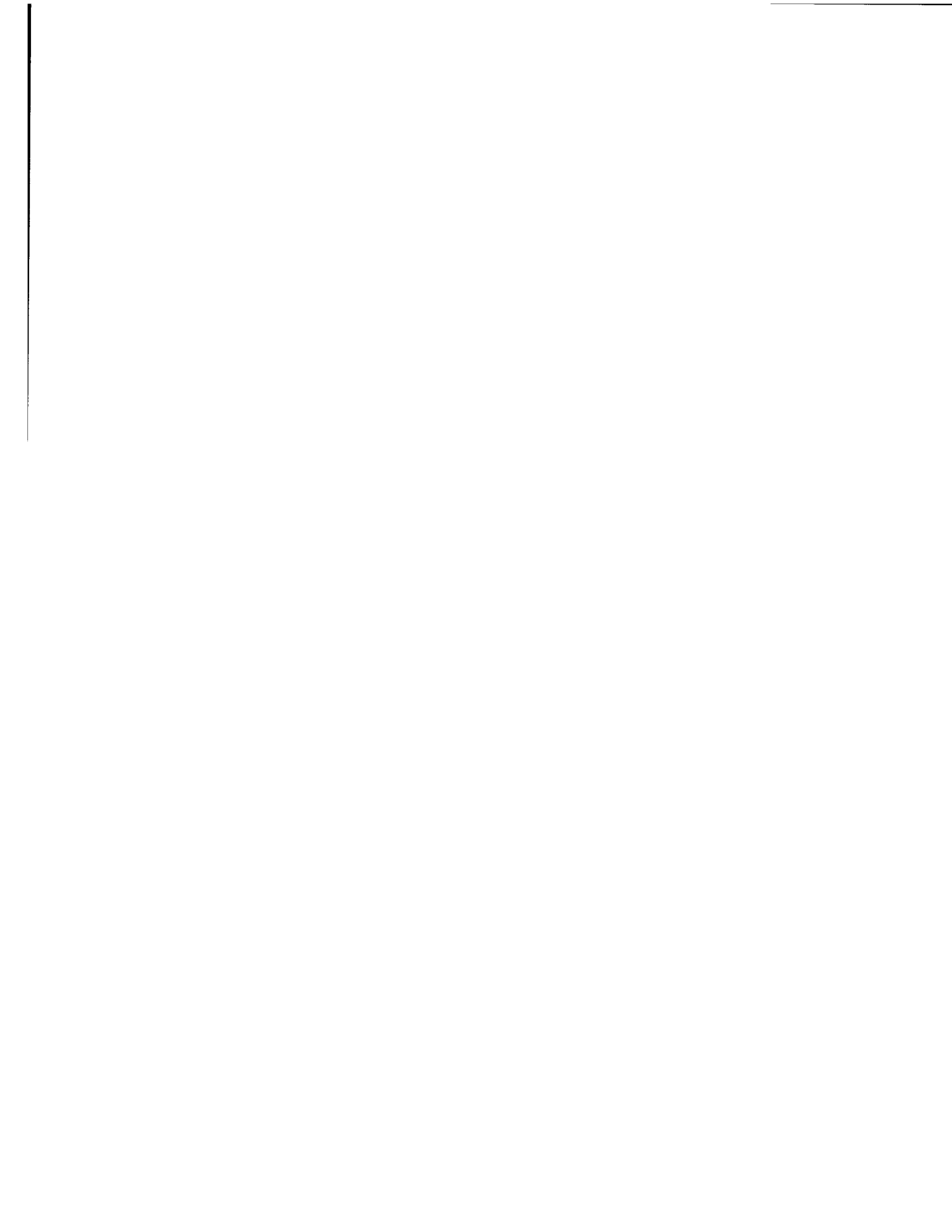
**STAFF RFI 6-4:**      **Reference schedule RLT-3 of Lambeth Townsend's testimony. Please provide timesheets or other billing invoices showing the tasks performed by Earl Robinson of AUS Consultants, Inc. by hour.**

**RESPONSE:**            Please see Attachment Staff RFI 6-4.

Prepared by:            Earl Robinson  
Sponsored by:           Earl Robinson



# ATTACHMENT STAFF 6-4







Response to Staff RFI 6-4

Apr/29/2016

EARL M. ROBINSON, CDP

Principal  
792 Old Highway 66, Suite 200  
Tijeras, NM 87059  
717.763.9890 • Tel

erobinson@ausconsultants.com

*Lloyd Gosselink, Attorneys at Law*

*(Monarch Utilities I, LP)*

*816 Congress Ave*

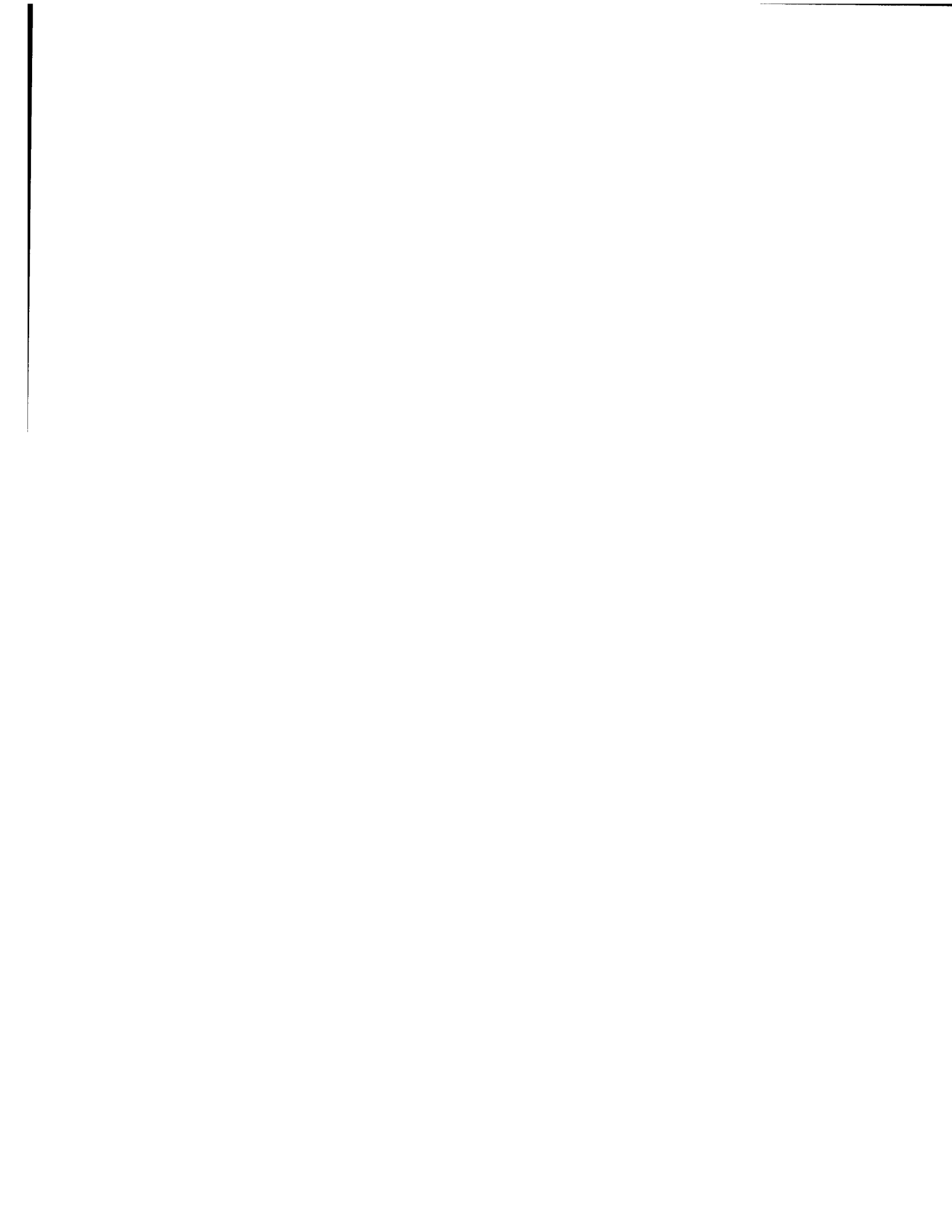
*Suite 1900*

*Austin, TX 78701*

RE: Job # 10-0538

12-31-14 Water and Wastewater Depreciation Studies

<u>Date</u>	<u>Invoice</u>	<u>Consultant</u>	<u>Description</u>	<u>Hours</u>	<u>Invoice Total Hrs.</u>	<u>Rate</u>	<u>Extended</u>	<u>Total Invoice</u>
5/15/2015	138275	Earl M. Robinson	Database-dev.-service life	<u>5</u>	5	240	<u>1,200.00</u>	1,200.00
5/25/2015	138712	Earl M. Robinson	Meeting & Property Tour	2		240	480.00	
5/26/2015	138712	Earl M. Robinson	Meeting & Property Tour	7.5		240	1,800.00	
5/27/2015	138712	Earl M. Robinson	Meeting & Property Tour	<u>7.5</u>	17	240	<u>1,800.00</u>	
							4,080.00	
	138712		<u>5/25/2015 Travel &amp; Living Expenses</u>				<u>1,122.75</u>	
			5/25/2015 Airfare			530.70		
			5/25/2015 Ground Travel			28.00		
			5/27/2015 Rental Car			138.60		
			5/27/2015 Auto Rental Fuel			23.60		
			5/27/2015 Garage Parking			30.00		
			5/25/2015 Meals-Cash			8.40		
			5/26/2015 Meals-Cash			9.20		
			5/27/2015 Meals-Cash			14.40		
			5/26/2015 Meals-Credit Card			20.73		
			5/26/2015 Misc-Map			6.80		
			5/26/2015 Hotel			137.22		
			5/27/2015 Hotel			<u>175.10</u>		
						<u>1,122.75</u>		
								5,202.75
7/9/2015	138969	Earl M. Robinson	Depr Database Assem	7.5		240	1,800.00	
7/14/2015	138969	Earl M. Robinson	Depr Database Assem	7.5		240	1,800.00	
7/15/2015	138969	Earl M. Robinson	Depr Database Assem	7.5		240	1,800.00	
7/16/2015	138969	Earl M. Robinson	Depr Database Assem	4		240	960.00	
7/20/2015	138969	Earl M. Robinson	Depr Database Assem	3.5		240	840.00	
7/21/2015	138969	Earl M. Robinson	Depr Database Assem	<u>7.5</u>	37.5	240	<u>1,800.00</u>	
							9,000.00	
	138969		<u>Travel &amp; Living Expenses</u>				<u>13.15</u>	
			6/7/2016 Texas Toll Road--Rental EZ Pass			13.15		9,013.15





**Response to Staff RFI 6-4**

**Apr/29/2016**

**EARL M. ROBINSON, CDP**

**Principal  
792 Old Highway 66, Suite 200  
Tijeras, NM 87059  
717.763.9890 ▪ Tel  
[erobinson@ausconsultants.com](mailto:erobinson@ausconsultants.com)**

**Lloyd Gosselink, Attorneys at Law**

**(Monarch Utilities I, LP)**

**816 Congress Ave**

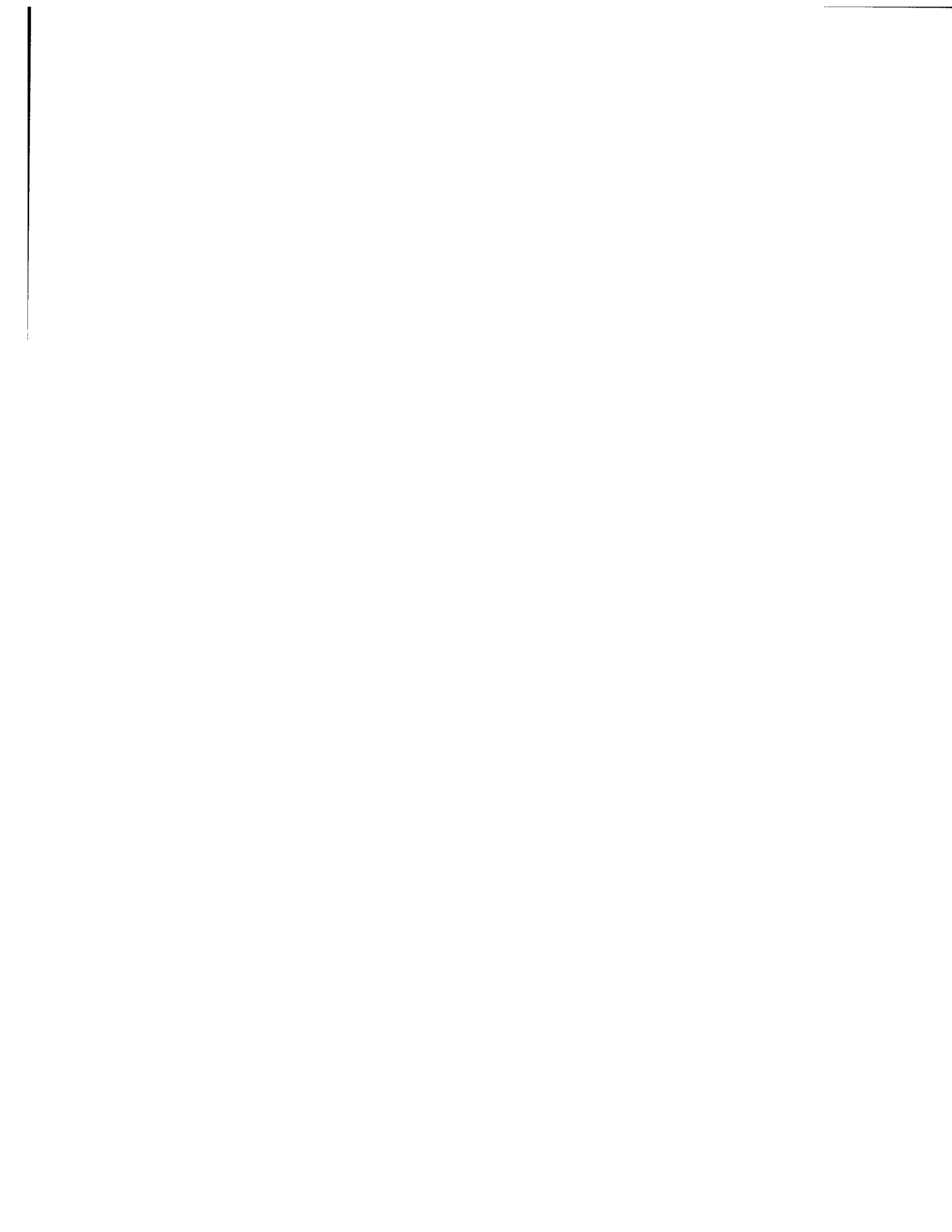
**Suite 1900**

**Austin, TX 78701**

**RE: Job # 10-0538**

**12-31-14 Water and Wastewater Depreciation Studies**

<u>Date</u>	<u>Invoice</u>	<u>Consultant</u>	<u>Description</u>	<u>Hours</u>	<u>Invoice Total Hrs.</u>	<u>Rate</u>	<u>Extended</u>	<u>Total Invoice</u>
8/14/2015	139277	Earl M. Robinson	Depr Database Assem	6		240	1,440.00	
8/20/2015	139277	Earl M. Robinson	Depr Database Assem	3.5		240	840.00	
8/21/2015	139277	Earl M. Robinson	Depr Database Assem	<u>2.5</u>		240	<u>600.00</u>	
					12			2,880.00
9/9/2015	139631	Earl M. Robinson	Depr Analysis	3		240	720.00	
9/10/2015	139631	Earl M. Robinson	Depr Analysis	3		240	720.00	
9/11/2015	139631	Earl M. Robinson	Depr Analysis	2.5		240	600.00	
9/15/2015	139631	Earl M. Robinson	Depr Analysis	3		240	720.00	
9/16/2015	139631	Earl M. Robinson	Depr Analysis	<u>4</u>		240	<u>960.00</u>	
					15.5			3,720.00





Response to Staff RFI 6-4

Apr/29/2016

EARL M. ROBINSON, CDP

Principal  
792 Old Highway 66, Suite 200  
Tijeras, NM 87059  
717.763.9890 ■ Tel  
[erobinson@ausconsultants.com](mailto:erobinson@ausconsultants.com)

Lloyd Gosselink, Attorneys at Law

(Monarch Utilities I, LP)

816 Congress Ave

Suite 1900

Austin, TX 78701

RE: Job # 10-0538

12-31-14 Water and Wastewater Depreciation Studies

Date	Invoice	Consultant	Description	Hours	Invoice Total Hrs.	Rate	Extended	Total Invoice
9/28/2015	140017	Earl M. Robinson	Depr Analysis	2		240	480.00	
9/29/2015	140017	Earl M. Robinson	Depr Analysis	2		240	480.00	
10/8/2015	140017	Earl M. Robinson	Depr Analysis	4		240	960.00	
10/12/2015	140017	Earl M. Robinson	Depr Analysis	3.5		240	840.00	
10/13/2015	140017	Earl M. Robinson	Depr Analysis	7.5		240	1,800.00	
10/14/2015	140017	Earl M. Robinson	Depr Analysis	7.5		240	1,800.00	
10/15/2015	140017	Earl M. Robinson	Depr Analysis	3		240	720.00	
10/20/2015	140017	Earl M. Robinson	Depr Analysis	4		240	960.00	
10/21/2015	140017	Earl M. Robinson	Depr Analysis	1		240	240.00	
10/30/2015	140017	Earl M. Robinson	Depr Analysis	6		240	<u>1,440.00</u>	
					40.5		9,720.00	
10/13/2015	140017	Adm Staff	Clerical	0.5		50	25.00	
10/14/2015	140017	Adm Staff	Clerical	1		50	50.00	
10/16/2015	140017	Adm Staff	Clerical	4.75		50	237.50	
10/19/2015	140017	Adm Staff	Clerical	3.5		50	175.00	
10/21/2015	140017	Adm Staff	Clerical	<u>1</u>		50	<u>50.00</u>	
					10.75		537.50	
	140017		<u>Out of Pocket Expenses</u>				<u>204.25</u>	
			(817 B&W Copies @ .25 ea)					10,461.75
11/4/2015	140428	Earl M. Robinson	Depr Analysis	4.5		220	990.00	
11/5/2015	140428	Earl M. Robinson	Depr Analysis	7.5		220	1,650.00	
11/6/2015	140428	Earl M. Robinson	Depr Analysis	7.5		220	1,650.00	
11/9/2015	140428	Earl M. Robinson	Report Writing	6		220	1,320.00	
11/10/2015	140428	Earl M. Robinson	Report Writing	6		220	1,320.00	
11/11/2015	140428	Earl M. Robinson	Report Writing	3		220	660.00	
11/12/2015	140428	Earl M. Robinson	Report Writing	<u>3</u>		220	<u>660.00</u>	
					37.5			8,250.00
12/10/2015	140727	Earl M. Robinson	Report Writing	1		240	240.00	
12/14/2015	140727	Earl M. Robinson	Report Writing	3		240	720.00	
12/28/2015	140727	Earl M. Robinson	Report writing	<u>2</u>		240	<u>480.00</u>	
					6		1,440.00	





**EARL M. ROBINSON, CDP**

**Principal**  
**792 Old Highway 66, Suite 200**  
**Tijeras, NM 87059**  
**717.763.9890 ■ Tel**  
[erobinson@ausconsultants.com](mailto:erobinson@ausconsultants.com)

**Response to Staff RFI 6-4**

**Apr/29/2016**

***Lloyd Gosselink, Attorneys at Law***

***(Monarch Utilities I, LP)***

***816 Congress Ave***

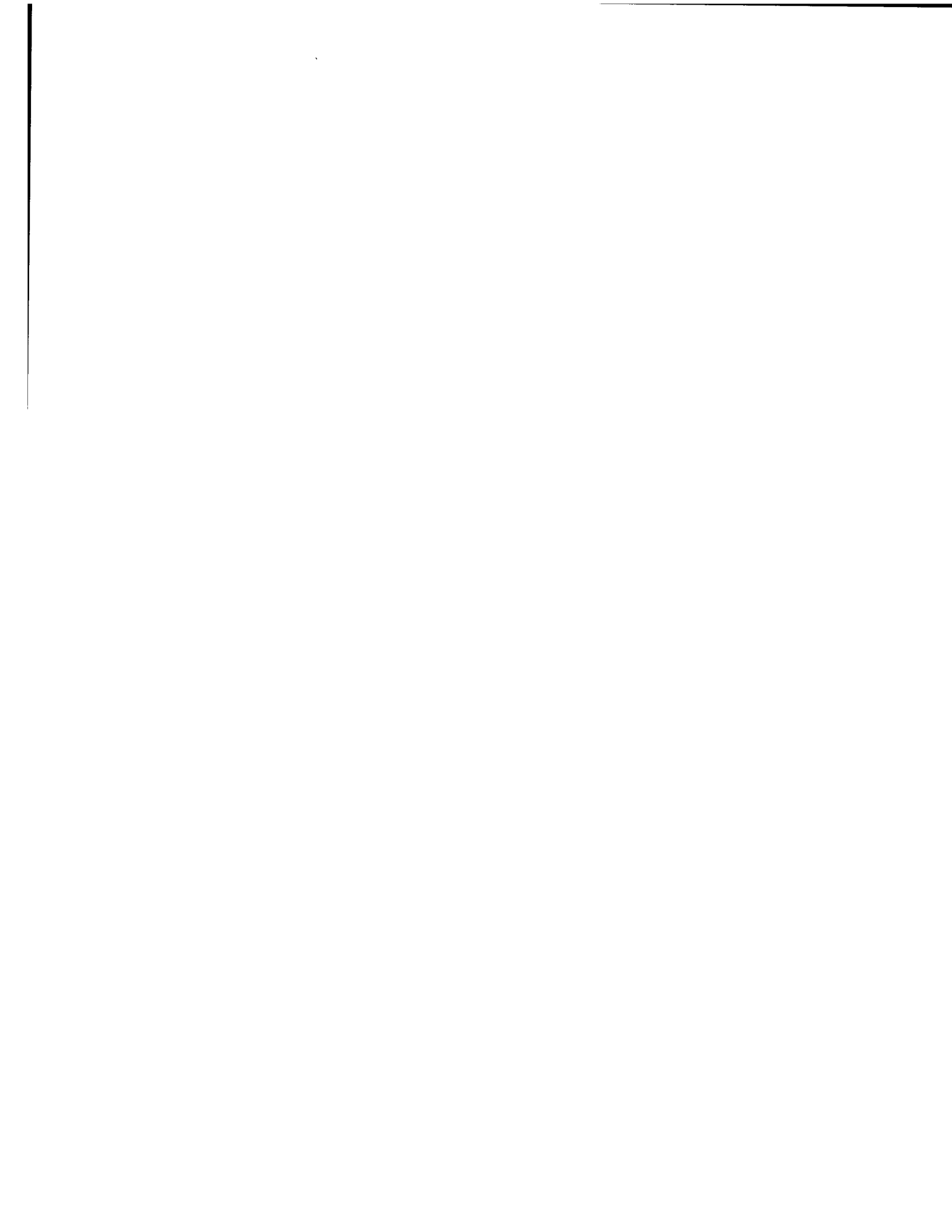
***Suite 1900***

***Austin, TX 78701***

***RE: Job # 10-0538***

***12-31-14 Water and Wastewater Depreciation Studies***

<u>Date</u>	<u>Invoice</u>	<u>Consultant</u>	<u>Description</u>	<u>Hours</u>	<u>Invoice Total Hrs.</u>	<u>Rate</u>	<u>Extended</u>	<u>Total Invoice</u>
12/14/2015	140727	Adm Staff	Clerical	1.5		50	75.00	
12/30/2015	140727	Adm Staff	Clerical	1		50	50.00	
12/31/2015	140727	Adm Staff	Clerical	<u>2.75</u>		50	<u>137.50</u>	
					5.25		262.50	
	140727		<u>Out of Pocket Expenses</u>				<u>19.50</u>	
			(30 B&W Copies @ .25)		7.50			1,722.00
			(16 Color Copies @ .75)		<u>12.00</u>			
					19.50			





**RECEIPT**

Rental Agreement Number: 522262344  
Vehicle Number: 64862081

**YOUR INFORMATION**

ROBINSON, EARL  
WIZARD NUMBER: GB917L  
AVIS DISC: VERIZONBUSINESS  
PAYMENT METHOD: MASTER XX7044

**YOUR RENTAL**

Picked up CLL  
Date/Time MAY 26, 2015@08 00AM  
Returned IAH  
Date/Time MAY 27, 2015@03 46PM  
Veh Group Subcompact  
Veh Charged Intermediate  
Vehicle HYUNDAI ACCENT  
Odometer Out 31427  
Odometer In 31489  
Fuel Reading Full

**YOUR VEHICLE CHARGES**

2 DY@ 60.00 120.00  
DISCOUNT 10.00 12.00  
YOUR TIME AND MILEAGE: 108.00

**YOUR TAXABLE FEES**

\*\*11 11% FEE 12.00  
CFC 6.00

**YOUR SUBTOTAL**

TAXABLE SUBTOT 126.00  
TAX 10.000% 12.60

**YOUR NON TAXABLE ITEMS**

TOTAL CHARGES 138.60  
NET CHARGES 138.60  
YOUR TOTAL DUE: 0.00

PAID ON MASTER XX7044  
\*\*CONCESSION RECOVERY FEE

**THANK YOU FOR RENTING WITH AVIS**

For inquiries or e-receipt visit  
www.AVIS.COM

**WELCOME TO  
SPEEDY STOP #87**

FE48037051001  
SPEEDY STOP #87  
2500 N.LOOP 336 W  
CONRDE TX 77304

Description	Qty	Amount
REGUNID CR #15	9.442G	23.60
SELF # 2.499/ G		
Subtotal		23.60
Tax		0.00
TOTAL		23.60
CREDIT \$		23.60

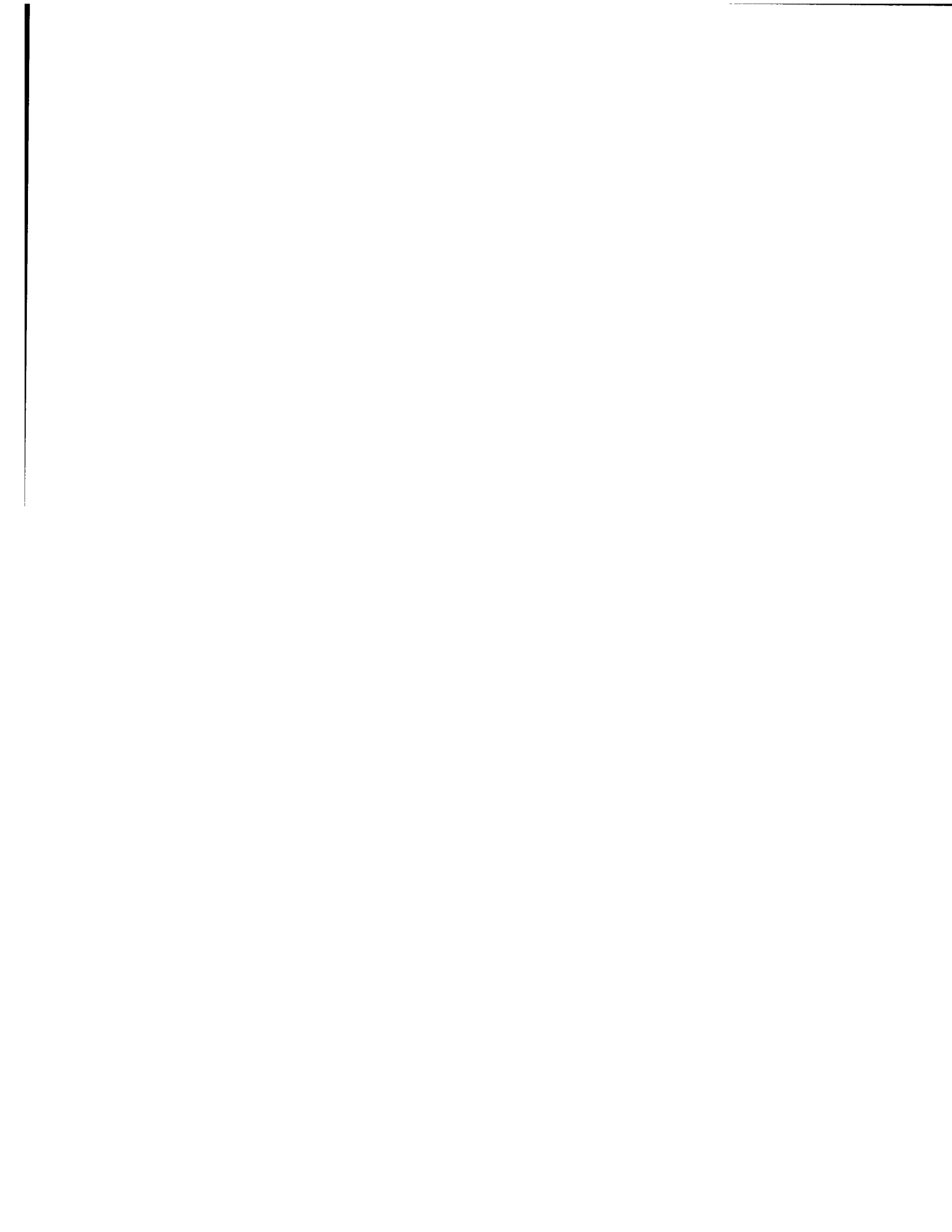
MasterCard  
XXXXXXXXXX7044  
Auth #: R5980Z  
Resp Code: 0  
Stan. 001684861  
Invoice #: 24627  
Shift #: 1

Store # 000000004809190  
SITE ID: FE48037051001

DIESEL FUEL CONTAINS  
UP TO 5% BIO-DIESEL  
STATE DIESEL TAX  
\$0.19 PER GALLON

**THANKS COME AGAIN**

ST# 1087 TILL XXXX DR# 0 TRAN# 9150267  
SSH: 0 05/27/15 14:55:56



CITY OF ALB AVIATION PKG

2200 SUNFORD BLVD SE

ALBUQUERQUE, NM. 87106

505-244-7884

Rcpt# 13600

05/27/15 19:55 L# 4 A# 33 Tkn# 43309

05/25/15 13:36 In 05/27/15 19:55 Out

Tkt# 484939

Garage \$ 30.00

Total Fee \$ 30.00

MasterCard \$ 30.00-

XXXXXXXXXXXX7044

Approval No.:R1547Z

Reference No.:217642964137

Change Due \$ 0.00

Thank You

Price Includes GGRT of 5%

Chili's Grill & Bar

Conroe #1016

2241 Stoneside Rd.

Conroe, TX 77303-1597

Server: kenneth

DOB: 05/26/2015

08:12 PM

05/26/2015

Table 93/1

1/10103

SALE

MASTERCARD

1048603

Card #XXXXXXXXXXXX7044

Magnetic card present: ROBINSON EARL M

Card Entry Method: S

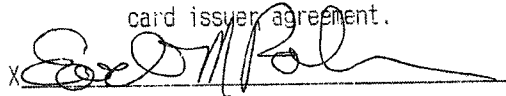
Approval: F4493Z

Amount: \$ 17.73

+ Tip: 3.00

= Total: 20.73

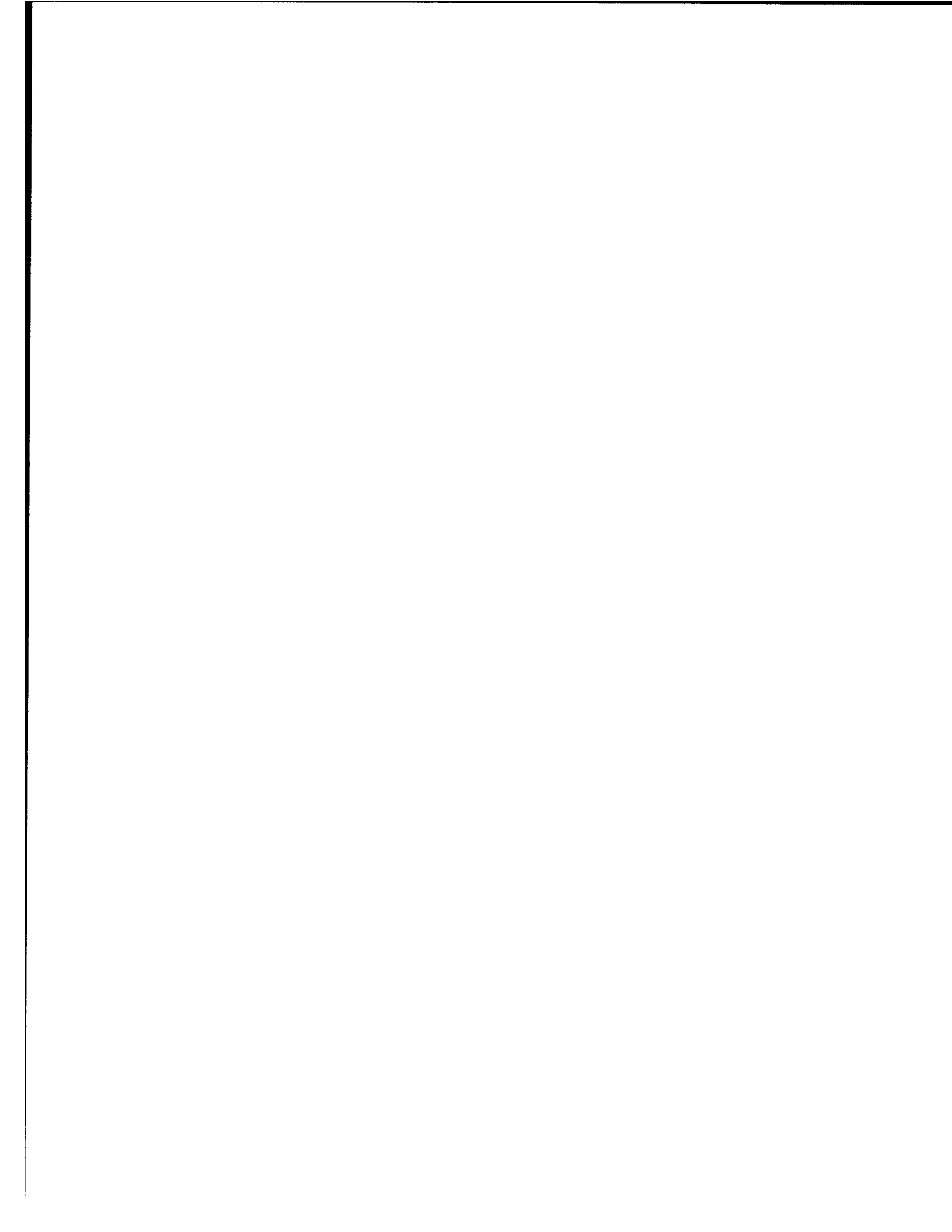
I agree to pay the above total amount according to the card issuer agreement.



Every Plate Has Its Perks  
Join My Chili's Rewards  
chilis.com/rewards

-----  
Gift Card activation is delayed by 4 hours.

Merchant Copy





earl robinson  
United States

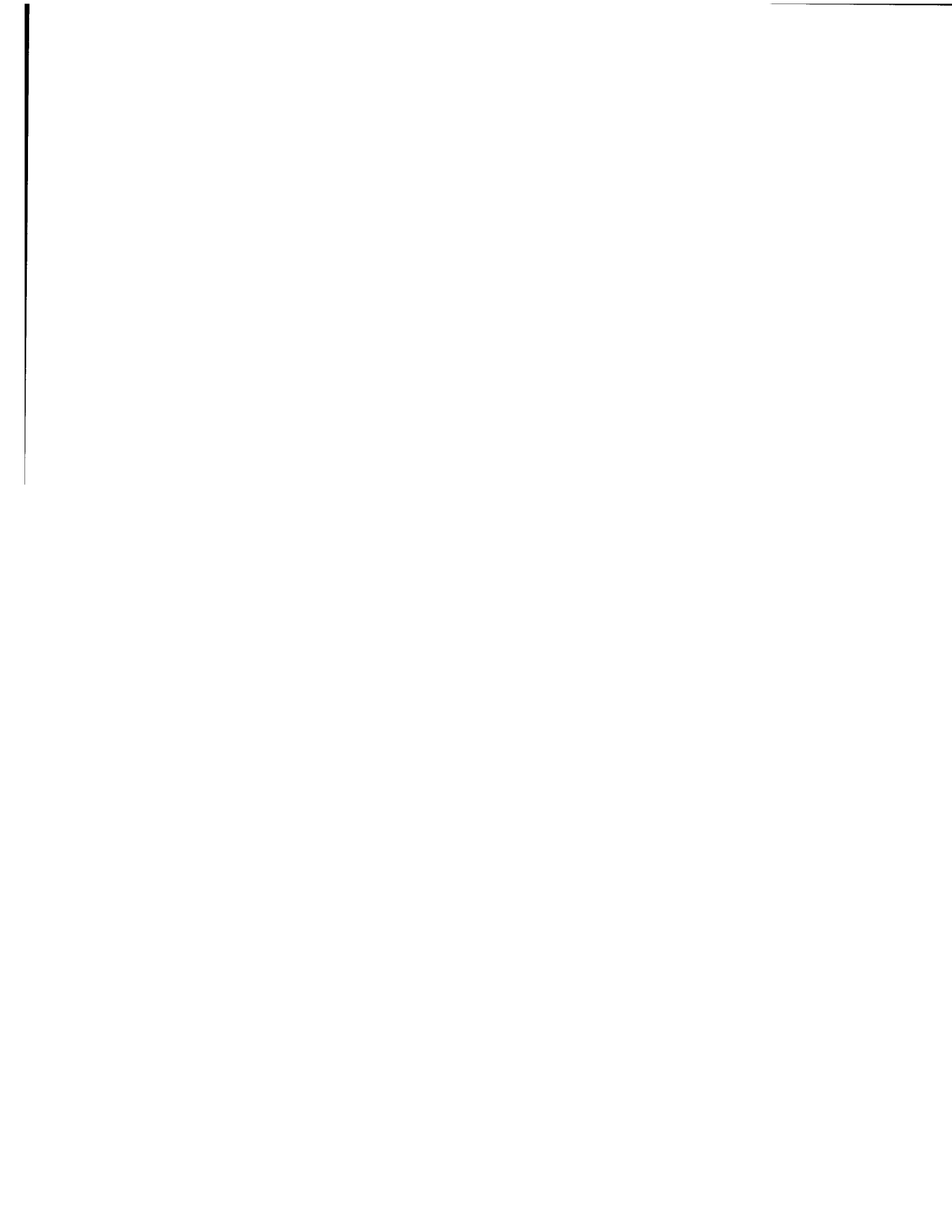
Folio No. : 142176  
A/R Number :  
Group Code :  
Company : passing through  
Membership No. :  
Invoice No. :

105  
05-27-15  
Room No. : 202  
Arrival : 05-26-15  
Departure : 05-27-15  
Conf. No. : 62129223  
Rate Code : IGCOR  
Page No. : 1 of 1

Date	Description	Charges	Credits
05-26-15	*Accommodation	154.95	
05-26-15	State Tax - Room	9.30	
05-26-15	City Tax - Room	10.85	
05-27-15	MasterCard		175.10
	<b>Total</b>	<b>175.10</b>	<b>175.10</b>
	<b>Balance</b>	<b>0.00</b>	

**Guest Signature:** \_\_\_\_\_  
I have received the goods and / or services in the amount shown hereon. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or associate fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.

Holiday Inn Express Hotel & Suites  
2240 Stoneside Rd.  
Conroe, Texas 77303  
Telephone: (936)788-5200 Fax: (936)788-5220



1 night at 121.45 USD.  
137 22 USD (incl. est. taxes) total.

**Room Preferences**

This hotel has a smoke free policy

**Please Note:**

Qualifying Rate ID Required.

**Guest Information**

Reservation for **Earl Robinson**  
Email: EROBINSON@AUSCONSULTANTS.COM  
MasterCard \*\*\*\*\*7044

**Summary of Charges**

Summary of Room Charges	Cost per night per room (USD)
Monday, May 25, 2015 - Tuesday, May 26, 2015 (1 night , AAA rate, AAA membership card required)	121.45
State Cost-Recovery Fee	1.07
Estimated government taxes and fees	14.70
<b>Total for stay (per room)</b>	<b>137.22</b>

**Additional Charges**

Complimentary on-site parking

Changes in taxes or fees implemented after booking will affect the total room price.

[About this rate](#)

**Modifying Your Reservation**

Please note that a change in the length or dates of your reservation may result in a rate change.

*No Show Charge - Due To Flight Diversions } Unable To Cancel*

*Airline Provided Lodging at College Station Texas*

**Cancelling Your Reservation**

You may cancel your reservation for no charge until May 24, 2015 (1 day[s] before arrival).

Please note that we will assess a fee of 137.22 USD if you must cancel after this deadline.

If you have made a prepayment, we will retain all or part of your prepayment. If not, we will charge your credit card.

This fee equals 1 night of your room charge plus tax (for the first night of your reservation)



**Courtyard Houston Sugar Land**  
Stafford, TX

I just booked this hotel Who's stayed here before? Any tips?







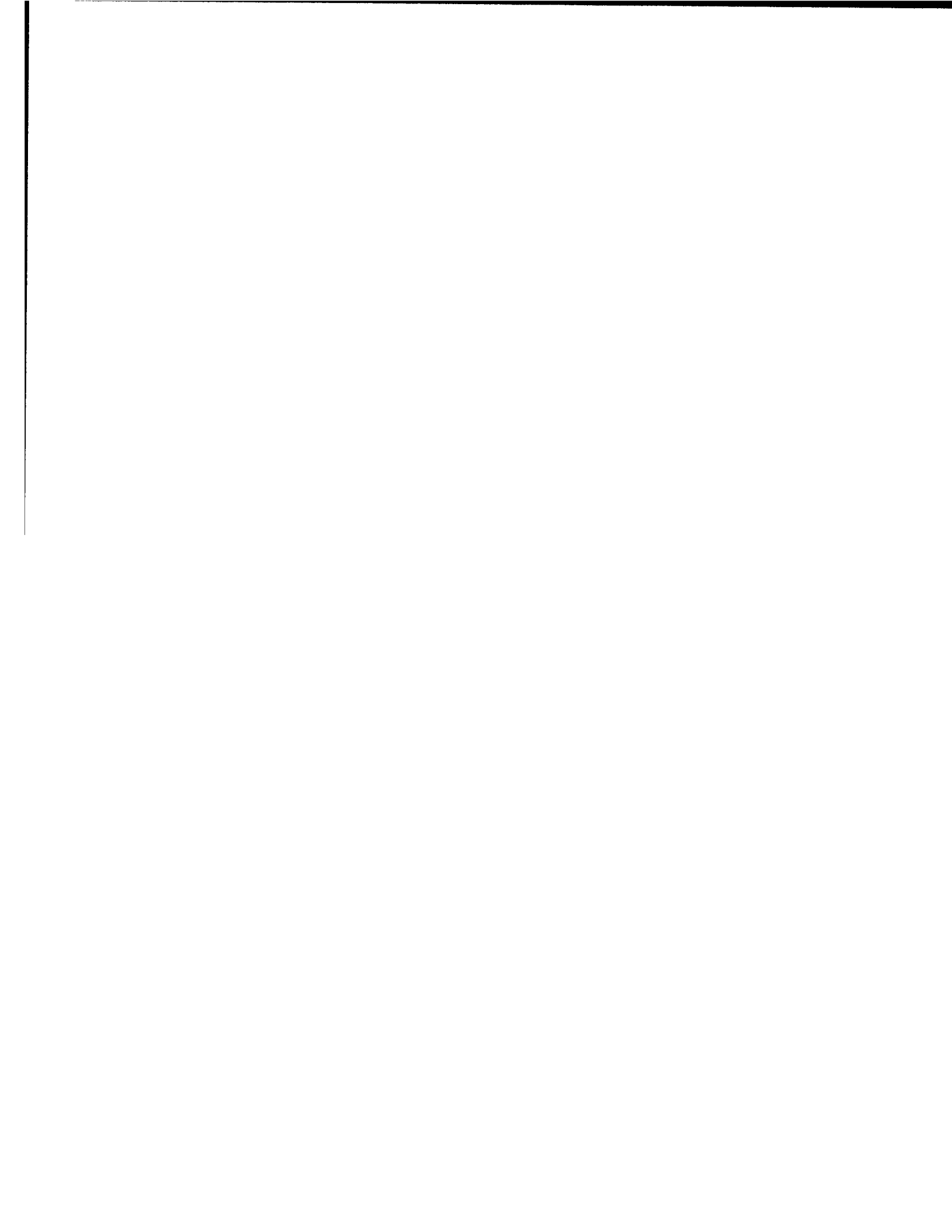
ACCOUNT STATEMENT

For Statement Period Ending: 05/05/2015

Account Number: 10160577100000  
Account Name: AUS CONSULTANTS INC  
Sub Account Number: 00005771001470  
Sub Account Name: ROBINSON, E M

Issue Date	Departure Date	Passenger Name	Ticket Number	Routing (Origin To To To)	Fare Basis	Airline Segment	Agency Number	Charges/ Credits
04/07/15	04/08/15	ROBINSON/EARL	0012350161337	PHX ABQ	SB14ZN	YV	45107355	200.00
04/08/15	04/08/15	ROBINSON/EARL	0372398353716	EFE FEE	YEF75	US	PHX	75.00
04/08/15	04/08/15	ROBINSON/EARL	0372183560231	PHX ABQ	YPST	AA	PHX	(22.00)
04/29/15	05/25/15	ROBINSON/EARLMMR	01624477401142	ABQ IAH DEN ABQ	UAA07ATAA00ATAA00ATAA0	UA UA UA UA	11891062	(530.70)
Air Travel Total:								783.70

Sub Account Number:	00005771001470	Charges/ Credits
Sub Account Name:	ROBINSON, E M	(820.40)
Issue Date:	04/24/15	(820.40)
Description:		Receipt
Payment / Adjustment:		(36.70)
Card Total:		(36.70)



**Kim Kidd**

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**From:** Earl Robinson  
**Sent:** Thursday, May 28, 2015 9:23 AM  
**To:** Kim Kidd  
**Subject:** RE: AIR TRAVEL

Kim,

The travel to Houston is for job is Monarch Water 10-0538.

Earl

Earl M. Robinson, CDP

7610 1st

10000 E. 1st Ave. Suite 100

Denver, CO 80231

Phone: 303.755.1100

Fax: 303.755.1101

www.earlrobinson.com



**From:** Kim Kidd  
**Sent:** Wednesday, May 27, 2015 8:26 AM  
**To:** Earl Robinson  
**Subject:** AIR TRAVEL

Hi...

I think the air travel charge im asking about is where your traveling now.. looks like departure date was 5/25/15  
\$530.70..  
ABQ-IAH-DEN-ABQ..

WHO DO I CHARGE FOR THIS ?

Thanks  
Kim

