



Control Number: 45570



Item Number: 177

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

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APPLICATION OF MONARCH  
UTILITIES I, L.P. TO CHANGE  
RATES FOR WATER AND SEWER  
SERVICE

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§  
§

BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

OFFICE OF PUBLIC UTILITY COUNSEL'S  
FIFTH REQUEST FOR INFORMATION TO  
MONARCH UTILITIES I, L.P.

The Office of Public Utility Counsel (OPUC) files and submits this Fifth Request for Information to Monarch Utilities I, L.P. (Monarch) in the captioned proceeding.

Under Commission Procedural Rules 22.141-.145, 16 Tex. Admin. Code Ch. 22, OPUC requests that Monarch, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

**Definitions**

As used in this introduction and in these questions,

- (1) "Monarch", the "Company", and "Applicant" refer to Monarch I, L.P. and its affiliates;
- (2) "You", "yours" and "your" refer to Monarch I, L.P. (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
- (3) "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (e-

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mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

### **Instructions**

1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.
2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your

control, please explain why not, and give the present location and custodian of any copy or summary of the document.

6. If any question appears confusing, please request clarification from the undersigned counsel.
7. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.
8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.
9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks

confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.

12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
13. If the information requested is included in previously furnished exhibits, workpapers, or 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.
14. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

#### **Claim of Privilege**

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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

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**PUC Docket No. 45570**  
**OPUC's Fifth Request For Information To**  
**Monarch I, L.P.**

- 5-1. Referencing W/P Schedule II-B-1, please indicate if the following assets were funded, or the Company reimbursed itself for this capital investment, with insurance proceeds.

Asset No.	Description	Monarch Total
20004497	Hurricane Rita Water Mains-	14,609.86
10000581	Hurricane Rita well Capital Repair-	3,130.68
10000598	Hurricane Rita Pump Station Capital Repair-	3,130.68
20004553	Hurricane Rita Sewer Lines-	2,608.91
20004559	Hurricane Rita Lift Station Capital Repair-	2,608.91

- 5-2. Please provide an updated version of W/P Schedule II-B-1 with all items not included in Rate Base highlighted in yellow.

- 5-3. Referencing W/P Schedule II-B-1, provide the corresponding tap fee revenues associated with each of the following assets.

Asset No.	Description	Monarch Total
20002625	New Water Taps	35,000.00
20003740	NEW 8 WATER TAP Inch-Plum Creek Elevated Stroage (	12,642.73
20005643	New Sewer Service Tap-234 Private Rd	3,931.14
20003633	New Sewer Tap - P51 Myers Pump; 550 Gal Septic Ta	2,885.11
20006608	New Sewer Service Tap-150 Wapiti	2,789.80
20003631	New Sewer Tap - P51 Myers Pump-56 Whitefoot	2,501.46
20006797	New Sewer Service Tap-320 Waterboard Rd-320 Waterb	2,290.77
20003415	New Sewer Tap-Lot #31 Sec H	2,160.79
20004018	New Sewer Tap-102 Doering Bay Cir	2,044.84
20004010	New Sewer Service Tap-112 Wildwood Way	1,964.89
20003414	New Sewer Tap-171 Monte Carlo	1,940.30
20000066	New Sewer Service Tap-104 Lu Ann Way-104 Lu Ann Wa	1,763.79
20003634	New Sewer Tap - 250 Gal Concrete Tank; 60' Service	1,648.61
20003743	NEW WATER SERVICE TAP-345 Sunflower Circle-3/4	1,584.14
20004647	New Sewer Service Tap-114 St Anne's Dr	1,484.84
20005317	New Sewer Service Tap-13 Carson Rd	1,466.76
20004009	New Sewer Tap-Indistrict Hvol - St Crox	1,424.49
20003788	New Sewer Tap; (2) 250 Gal Concrete Tank; 6' Sewer	1,401.34

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Asset No.	Description	Monarch Total
20003795	New Sewer Tap; P51 Myers Pump-381 Canadian Dr	1,382.61
20003693	New Sewer Tap - (2) 250 Gal Concrete Tanks; 20' Se	1,208.09
20004872	New Sewer Service Tap-137 Pinehurst Dr	1,177.91
20005608	New Water Service Tap-29911 Dallas	1,060.50
20003796	New Sewer Tap; P51 Myers Pump-120-D Pine Trail	1,037.96
20005354	New Water Service Tap-113 Hillcrest Dr	987.15
20005761	New Water Service Taps (3)-Carolyn & Hickory Trace	975.00
20005162	NEW WATER SERVICE TAP-4 Inch;10462 Inch-8501 JEANE	957.25
20006364	New Sewer Service Tap-459 Pr 1508	927.95
20003741	New Water Service Tap-2610 Rice Flower	847.66
20003682	New Water Tap Service-301 Serenity North	816.40
20003865	New Service Line & Tap Line-29815 Brownsville	727.48
20005077	New Sewer Service Tap-101 Carson Rd	711.00
20003618	New Water Tap Service-252 Geronimo Trail	669.63
20004027	New Sewer Tap-520 Lakeshore Dr L 139 E	668.21
20004613	New Water Service Tap-9039 Crystal Springs Dr	645.57
20005061	New Water Service Tap-3421 Samoan Ct	553.43
20003564	New Water Tap Service-100 1st St	552.50
20006675	New Water Service Tap-13-10 Governors Pt	550.89
20003866	New Service Line & Tap Line-29823 Brownsville	548.08
20003554	New Water Tap Service-Lot#34a Holiday Villages	531.88
20003867	NEW WATER SERVICE TAP - 1 Inch;7975 Inch-10521 FM	517.57
20005161	New Water Service Tap-291 High Point	478.62
20003817	Road Bore - New Water Tap Service-29823 Brownsvill	467.01
20003751	New Water Service Tap-19 Burton Hill Rd	453.03
20003356	New Water Service Tap-Raywood Well 1 (W1)	452.83
20004606	New Water Service Tap-4012 Daniels Place	447.97
20006027	New Water Service Tap-134 C	424.33
20003503	New Water Service Tap-29914 El Paso	404.08
20003509	New Water Service Tap-3501 Merlin	370.86
20003872	Crimped & Repaired Tap Leak - New Service Line-Ind	364.00
20003390	New Water Service Tap-Indistrict Wdbh	361.77
20003606	New Water Tap Service-130 Ash Circle	353.25
20003754	New Water Service Tap-10761 Pine Street	350.31
20003574	New Water Tap Service-21 Island Section 8	325.01

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Asset No.	Description	Monarch Total
20003820	New Water Service Tap-Lot 28 Blk 10 Wildewood	293.92
20003814	New Water Tap Service-4-494 Sussex Dr	289.01
20003556	New Water Tap Service-Lakeway Harbor Surface Water	287.50
20003466	New Water Service Tap-321 Green Pastures	270.09
20003416	New Water Tap-280 Cedar Lane	265.58
20004870	New Sewer Service Tap-129 Little River Bend	260.45
20005921	New Water Tap-Cesh Surface Water Plant (U1)	247.58
20003683	New Water Tap Service-9095 Pleasant Ridge	219.37
20003501	New Water Service Tap-1680 Scott Hill Rd	215.41
20003500	New Water Service Tap-Lot#7 Blk-1 Hacienda	215.00
20003816	New Water Tap Service-7032 Cabot Estates	212.82
20004661	New Water Service Tap-4823 Horseshoe Dr	212.62
20005513	New Water Service Tap-5439 Louisiana Loop	212.62
20006731	New Water Service Tap-Little Mineral	212.62
20003938	New Water Service Tap-7825 Retta Rd	209.47
20003398	New Water Service Tap-8-13 Governors Point	208.70
20004507	New Water Service Tap-818 Pinwah Pines	193.28
20003445	New Water Service Tap-Lot# 51 Park Crest	192.49
20003749	New Water Service Tap-9660-B Cr 915 A	188.39
20003620	New Water Tap Service-7799 Oak Road	188.00
20003553	New Water Tap Service-121 Willow Creek Circle	166.88
20003570	New Water Tap Service-Hulon Lakes Well #2 (W2)	164.32
20003447	New Water Service Tap-Holiday Village Lake Medina	153.55
20003353	New Water Service Tap-205 Cedar Trial Dr	152.42
20003388	New Water Service Tap-212 Bushwacker Dr	149.61
20003211	New Water Tap-Lot 15 Hill Crest Circle	147.90
20006966	New Water Service Tap-104 Old Fort Rd-104 Old Fort	144.16
20003215	New Water Tap-112 St Andrews Dr	143.26
20003214	New Water Tap-Lot 7 Hacienda	138.40
20003565	New Water Tap Service-Indistrict Wdbh	137.85
20003812	New Water Tap Service-4103 Cactus Dr	137.68
20005691	New Water Service Tap-900 Friar Tuck Dr N	128.27
20003676	New Water Tap Service-4429 Pepper Tree	127.47
20006427	New Water Service Tap-318 W 122	127.26
20003815	Lanscaped Due To New Tap-286 Choctaw	124.13
20003227	New Water Tap-Lot 1 & 2 Blk 148 Katherine Dr	120.51



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<b>Asset No.</b>	<b>Description</b>	<b>Monarch Total</b>
20003462	New Water Service Tap-2-892 Arapaho Dr	114.00
20003566	New Water Tap Service-1-576 Friar Tuck	106.89
20003619	New Water Tap Service-20157 Eastern Hills	104.77
20003291	New Water Tap Service-5591 County Rd 510 N	101.62
20003336	New Water Service Tap-125 Serenity Court	99.22
20003615	New Water Tap Service-429 Shotgun Dr	94.32
20005215	New Water Service Tap-1-3 Holiday Shores	86.36
20003202	New Water Tap-Lot 73 Sec F	85.45
20003219	New Water Tap-Lot 137 Blk G Trinidad	85.22
20003221	New Water Tap-Lot 130 Belize Dr	85.22
20003208	New Water Tap-Lot 68g Antilles Rd	83.61
20003200	New Water Tap-Lot 205 Sec D Morocco Drive	83.35
20003222	New Water Tap-Lot 10 Blk 137 Sir Henry Dr	82.67
20003216	New Water Tap-Lot 6 Blk 1 Hacienda	80.58
20005178	New Water Service Tap-532 Knottingham	79.11
20006229	New Water Service Tap-16914 Daystar St	71.24
20003610	New Water Tap Service-631 Whisperview Cr	66.62
20003213	New Water Tap-660 Friar Tuck Dr	66.51
20004665	New Water Service Tap-193 Hideaway Loop	65.53
20004666	New Water Service Tap-104 Brierwood Dr	65.53
20003358	New Water Service Tap-Indistrict Hvol Lot 379 Sec	63.13
20003332	New Water Service Tap-Lot 134 Sec F Hvol	61.93
20003357	New Water Service Tap-Lot 307 Sec-C Cherokee Shore	60.84
20004522	New Water Service Tap-5636 Arrowhead Dr	59.12
20003673	New Water Tap Service-Lot 540 Sec C	58.81
20003294	New Water Tap Service-Lot #421 Shawnee Circle	50.81
20003612	New Water Tap Service-2633 Tanglewood Blvd/7bkc Tw	49.66
20003354	New Water Service Tap-8300 Marianna	49.22
20003359	New Water Service Tap-200 Country Ln	46.22
20003283	New Water Tap Service-176 Fairway Loop	44.92
20003292	New Water Tap Service-29-2 Holiday Shores	44.92
20003205	New Water Tap-Martineque Ln	44.85
20003206	New Water Tap-Monte Carlo	44.85
20003276	New Water Tap Service-10-7 Holiday Shores	44.82
20003277	New Water Tap Service-9 P Oaks	44.82
20003295	New Water Tap Service-90 Pat Lane	44.82

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Asset No.	Description	Monarch Total
20003296	New Water Tap Service-210 Hiland Ln	44.82
20003299	New Water Tap Service-Rc/Van Antwerp	44.82
20003300	New Water Tap Service-30495 Preston Bend Dr	44.82
20003333	New Water Service Tap-1491 Coods Corne Rd	44.82
20003271	New Water Tap Service-137 Holland St	44.68
20003363	New Water Service Tap-4318 Mt Hollow	44.56
20003225	New Water Tap-1303 Keechi Trail Ch	40.38
20003237	New Water Tap-	40.02
20003331	New Water Service Tap-2-22 Callender 1	39.88
20003270	New Water Tap Service-Indistrict Ivanhoe	38.68
20004513	New Water Service Tap-Lot 40 Sec I Sir Henry	37.51
20003617	New Water Tap Service-208 Cherokee Shores Dr	36.15
20003391	New Water Service Tap-119-7 Camelot 2	35.00
20003397	New Water Service Tap-280 Cedar Lane	35.00
20003400	New Water Service Tap-2 62 Acre Tract	35.00
20003677	New Water Tap Service-7067 Evergreen	33.82
20004842	New Water Service Tap-18301 Peaceful Woods Dr	29.21
20003273	New Water Tap Service-256 Broken Bow	24.18
20003362	New Water Service Tap-3309 East Weems Ct	19.83
20005614	New Water Service Tap-9303 Hidden Ct	18.44
20005139	New Sewer Service Tap-Lot 18 Sec D	17.74
20005302	New Water Service Tap-117 Fargo Rd	17.63
20003301	New Water Tap Service-21 Red Oak Circle	17.48
20005303	New Water Service Tap-203 Friar Tuck North	16.29
20003322	New Water Service Tap-Indistrict Tower Terrace	9.76
20003323	New Water Service Tap-Indistrict Tower Terrace	9.76
20003328	New Water Service Tap-305 Navajo Tr	7.69
20003334	New Water Service Tap-298 Westminster/01 Camb	5.23
20003278	New Water Tap Service-894 Pinwah Pines	5.16
20003279	New Water Tap Service-2025 Owens Ave	5.16
20003281	New Water Tap Service-11-27 Governors Point	5.16
20003286	New Water Tap Service-110 Hillcrest Dr	5.16
20003287	New Water Tap Service-13-13 Governors Point	5.16
20003288	New Water Tap Service-13-15 Governors Point	5.16
20003289	New Water Tap Service-3-16 Governors Point	5.16
20003290	New Water Tap Service-199 Pine Oak Dr	5.16

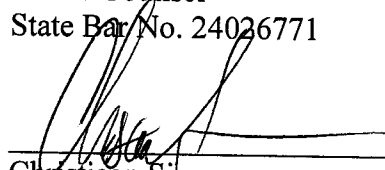
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<b>Asset No.</b>	<b>Description</b>	<b>Monarch Total</b>
20003293	New Water Tap Service-184 Shadow Ln	5.16
20003297	New Water Tap Service-31 Cameo St	5.16
20003302	New Water Tap Service-1233 Parkview Drive	5.16
20003298	New Water Tap Service-172 Oklahoma Ave	5.14
20003272	New Water Tap Service-21 Shady Lane	5.02
20003275	New Water Tap Service-30022 Pacific	5.02

Dated: May 16, 2016

Respectfully submitted,

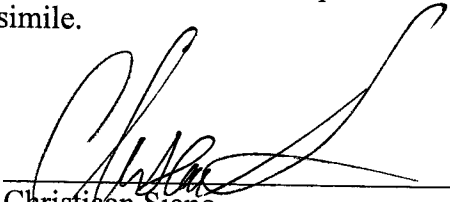
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**CERTIFICATE OF SERVICE**  
SOAH Docket No. 473-16-2873.WS  
PUC Docket No. 45570

I certify that today, May 16, 2016, a true copy of the Office of Public Utility Counsel's Fifth Request for Information to Monarch I, L.P. was served on all parties of record via United States First-Class Mail, hand-delivery or facsimile.

  
\_\_\_\_\_  
Christiaan Siano