

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

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

**MONARCH UTILITIES I, L.P.'S AMENDED RESPONSES TO  
OFFICE OF PUBLIC UTILITY COUNSEL'S FIRST REQUEST FOR INFORMATION**

To: Office of Public Utility Counsel, by and through its attorney of record, Christiaan Siano, Assistant Public Counsel, 1701 North Congress Avenue, Suite 9-180, P. O. Box 12397, Austin, Texas 78711-2397.

Monarch Utilities I, L.P. ("Monarch") files its Amended Responses to the Office of Public Utility Counsel's ("OPUC") First Requests for Information received April 1, 2016. This response is timely filed. This response may be treated by all parties as if it were filed under oath.

Respectfully submitted,

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ATTORNEYS FOR MONARCH UTILITIES I, LP

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of June, 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 AMENDED RESPONSES TO**  
**OPUC'S FIRST REQUESTS FOR INFORMATION**

**OPUC RFI 1-10:** Provide the total short-term incentive expense included in the test year by each employee receiving such incentive pay. Be sure to identify those that are direct employees are those that are shared service employees. For the shared service employees, include the shared services cost center in which the employee is located and the allocation factor used to allocate to Texas operations. Also include the total amount that is charged to expense and the amount that is charged to capital in the filing.

**AMENDED  
RESPONSE:**

See Amended Confidential Attachment OPUC 1-10, for the short-term incentive expense included in the test year by each employee. This confidential attachment identifies direct and allocated employees, the cost center for allocated employees and the allocation factor. All short-term incentive amounts were charged to expense in the test year.

Prepared by: Kent Cauley  
Sponsored by: Robert Kelly

# CONFIDENTIAL

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

STYLE: Application Of Monarch Utilities, I, L.P., To Change Rates  
for Water and Sewer Service

SUBMITTING PARTY: Monarch Utilities I, L.P.

BRIEF DESCRIPTION OF CONTENTS: Confidential Portion of  
Monarch Utilities I, L.P.'s Amended Responses to OPUC's 1st RFIs  
plus CD

BATE STAMPED PAGE NUMBER RANGE: Bate Stamp: 1 - 2

ENVELOPE \_\_\_\_\_

DATE PROVIDED: June 6, 2016

**PUC DOCKET NO. 45570**  
**SOAH DOCKET NO. 473-16-2873.WS**  
**MONARCH'S AMENDED RESPONSES TO**  
**OPUC'S FIRST REQUESTS FOR INFORMATION**

**OPUC RFI 1-14:**     **Provide the monthly number of employees for Monarch Texas operations for each month subsequent to the test year end through the most recent information available.**

**AMENDED RESPONSE:**     See Amended Attachment OPUC 1-14 for the number of Monarch Utilities I, LP employees.

Prepared by:           Edward Taussig  
Sponsored by:         Carmelitha Bordelon-Taylor

Errata Monarch Employees  
PUC Docket No. 45570  
Amended Attachment OPUC RFI 1-14 (6/6/16)

Number of Direct Monarch Utilities I, LP

Month	0.86 Water	0.14 Wastewater	Total
Feb-16	51	8	59
Jan-16	51	8	59
Dec-15	52	8	60
Nov-15	52	9	61
Oct-15	52	9	61
Sep-15	50	8	58
Aug-15	50	8	58
Jul-15	48	8	56

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**MONARCH'S AMENDED RESPONSES TO  
OPUC'S FIRST REQUESTS FOR INFORMATION**

**OPUC RFI 1-15:** Provide the monthly number of employees for each of the shared services cost centers where costs are allocated to this filing for each month subsequent to the test year end through the most recent information available.

**AMENDED  
RESPONSE:** See Amended Attachment OPUC 1-15 for the number of shared services cost centers employees. See Errata Schedule IV-4.1-Cost Allocation Manual for the definitions of the cost centers.

Prepared by: Edward Taussig  
Sponsored by: Carmelitha Bordelon-Taylor

Errata Shared Services Employees - Includes Corporate  
PUC Docket No. 45570  
Amended Attachment OPUC RFI 1-15 (6/6/16)

Total Number of Allocated Employees

Month	TXU			Austin	San Antonio	West Mgmt	SouthWest	Total
	Administration	CSC	FSC	Shared Ops	Shared Ops		Water Company	
Feb-16	6	8	4	3	2	1	13	37
Jan-16	6	8	4	3	2	1	13	37
Dec-15	5	8	4	3	2	1	12	35
Nov-15	5	9	3	3	2	1	13	36
Oct-15	5	9	3	3	2	1	13	36
Sep-15	6	9	3	3	2	1	12	36
Aug-15	7	9	3	3	2	1	13	38
Jul-15	6	9	3	3	2	1	12	36

Month	0.86	0.14	Total
	Water	Wastewater	
Feb-16	32	5	37
Jan-16	32	5	37
Dec-15	30	5	35
Nov-15	31	5	36
Oct-15	31	5	36
Sep-15	31	5	36
Aug-15	33	5	38
Jul-15	31	5	36



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**OPUC RFI 1-16:**     **Provide a detailed listing of all costs allocated to this filing from each shared service cost center. Be sure to include not only the cost center name and number, but also the entity in which the cost center is included.**

**AMENDED**  
**RESPONSE:**        Please see Amended Attachment OPUC 1-16 for Texas Utility Administration Allocations.

Prepared by:        Carmelitha Bordelon-Taylor  
Sponsored by:       Robert Kelly

Amended Attachment OPUC 1-16 Detailed Listing of Allocated Costs (6/6/16)  
Texas Utilities

Distribution Name	Entity	Entity Name	Cost Ctr	Cost Ctr Description	Cost center Type		Grand Total
					Sender	Receiver	
Austin Shared	2000	SWWC Utilities, Inc	20000216	AUSTIN DIST HB WTR		123,890.68	123,890.68
Austin Shared	2000	SWWC Utilities, Inc	20000221	AUSTIN DIST HB WW		120,542.29	120,542.29
Austin Shared	2000	SWWC Utilities, Inc	20000226	AUSTIN DIST WIND WTR		328,711.49	328,711.49
Austin Shared	2000	SWWC Utilities, Inc	20000231	AUSTIN DIST WIND WW		315,760.14	315,760.14
Austin Shared	2000	SWWC Utilities, Inc	20000236	AUSTIN DIST FCUC WW		109,486.26	109,486.26
Austin Shared	2000	SWWC Utilities, Inc	20000241	AUSTIN DIST HUNT		7,139.03	7,139.03
Austin Shared	2000	SWWC Utilities, Inc	20000246	AUSTIN DIST INV		7,202.21	7,202.21
Austin Shared	2000	SWWC Utilities, Inc	20000251	AUSTIN DIST MDTX WTR		6,001.84	6,001.84
Austin Shared	2000	SWWC Utilities, Inc	20000256	AUSTIN DIST MDTX WW		5,496.43	5,496.43
Austin Shared	2000	SWWC Utilities, Inc	20000277	AUSTIN OPS SHARED	(1,263,545.98)		(1,263,545.98)
Austin Shared	3020	Monarch Utilities I, LP	30200311	AUSTIN DIST MON WTR		172,474.03	172,474.03
Austin Shared	5010	Metro-H2O, Ltd.	50100055	AUSTIN DIST METRO		66,841.58	66,841.58
<b>Austin Shared Total</b>					<b>(1,263,545.98)</b>	<b>1,263,545.98</b>	<b>0.00</b>
Benbrook Shared	3020	Monarch Utilities I, LP	30200095	BENBROOK OPS	(1,493,508.61)		(1,493,508.61)
Benbrook Shared	3020	Monarch Utilities I, LP	30200307	BEN DIST MON WTR		1,493,508.61	1,493,508.61
Benbrook Shared	3020	Monarch Utilities I, LP	30200318	BEN DIST MON WW			
<b>Benbrook Shared Total</b>					<b>(1,493,508.61)</b>	<b>1,493,508.61</b>	<b>0.00</b>
Conroe Shared	2000	SWWC Utilities, Inc	20000261	CON DIST SWU		12,788.13	12,788.13
Conroe Shared	3020	Monarch Utilities I, LP	30200097	CONROE OPS	(1,650,081.43)		(1,650,081.43)
Conroe Shared	3020	Monarch Utilities I, LP	30200306	CON DIST MON WTR		1,147,301.62	1,147,301.62
Conroe Shared	3020	Monarch Utilities I, LP	30200317	CON DIST MON WW		489,991.68	489,991.68
<b>Conroe Shared Total</b>					<b>(1,650,081.43)</b>	<b>1,650,081.43</b>	<b>(0.00)</b>
East Shared	2000	SWWC Utilities, Inc	20000260	EAST DIST SWU		1,086.61	1,086.61
East Shared	2000	SWWC Utilities, Inc	20000265	EAST DIST TK WTR		6,465.31	6,465.31
East Shared	2000	SWWC Utilities, Inc	20000270	EAST DIST TK WW		5,786.18	5,786.18
East Shared	3020	Monarch Utilities I, LP	30200301	EAST MGMT	(543,303.45)		(543,303.45)
East Shared	3020	Monarch Utilities I, LP	30200305	EAST DIST MON WTR		448,605.66	448,605.66
East Shared	3020	Monarch Utilities I, LP	30200316	EAST DIST MON WW		81,359.69	81,359.69
<b>East Shared Total</b>					<b>(543,303.45)</b>	<b>543,303.45</b>	<b>0.00</b>
Mabank Shared	3020	Monarch Utilities I, LP	30200096	MABANK OPS	(1,374,949.94)		(1,374,949.94)
Mabank Shared	3020	Monarch Utilities I, LP	30200308	MAB DIST MON WTR		1,063,936.26	1,063,936.26
Mabank Shared	3020	Monarch Utilities I, LP	30200319	MAB DIST MON WW		311,013.68	311,013.68
<b>Mabank Shared Total</b>					<b>(1,374,949.94)</b>	<b>1,374,949.94</b>	<b>0.00</b>
Pottsboro Shared	2000	SWWC Utilities, Inc	20000266	POTS DIST TK WTR		41,350.92	41,350.92
Pottsboro Shared	2000	SWWC Utilities, Inc	20000271	POTS DIST TK WW		36,999.61	36,999.61
Pottsboro Shared	3020	Monarch Utilities I, LP	30200094	POTTSBORO OPS	(540,534.84)		(540,534.84)
Pottsboro Shared	3020	Monarch Utilities I, LP	30200309	POTS DIST MON WTR		444,454.77	444,454.77
Pottsboro Shared	3020	Monarch Utilities I, LP	30200320	POTS DIST MON WW		17,729.54	17,729.54
<b>Pottsboro Shared Total</b>					<b>(540,534.84)</b>	<b>540,534.84</b>	<b>0.00</b>
San Antonio Shared	2000	SWWC Utilities, Inc	20000206	SA DIST DIA		185,828.98	185,828.98
San Antonio Shared	2000	SWWC Utilities, Inc	20000211	SA DIST WS		441,475.30	441,475.30
San Antonio Shared	2000	SWWC Utilities, Inc	20000278	SA OPS SHARED	(809,007.33)		(809,007.33)
San Antonio Shared	3020	Monarch Utilities I, LP	30200312	SA DIST MON WTR		150,879.87	150,879.87
San Antonio Shared	3020	Monarch Utilities I, LP	30200323	SA DIST MON WW		30,823.18	30,823.18
<b>San Antonio Shared Total</b>					<b>(809,007.33)</b>	<b>809,007.33</b>	<b>(0.00)</b>
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000033	Administrative-TXU	(2,613,671.95)		(2,613,671.95)
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000034	CUSTOMER SERVICE	(1,358,052.24)		(1,358,052.24)
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000098	BI&C-TXU	(600,912.16)		(600,912.16)
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000202	ADMIN DIST DIA		44,169.69	44,169.69
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000203	CS DIST DIA		33,105.47	33,105.47
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000204	A-C DIST DIA		16,050.23	16,050.23
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000207	ADMIN DIST WW		105,007.20	105,007.20
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000208	CS DIST WS		78,703.59	78,703.59
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000209	A-C DIST WS		38,157.18	38,157.18
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000212	ADMIN DIST HB WTR		115,042.53	115,042.53
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000213	CS DIST HB WTR		86,225.13	86,225.13
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000214	A-C DIST HB WTR		41,803.78	41,803.78
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000217	ADMIN DIST HB WW		111,830.80	111,830.80
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000218	CS DIST HB WW		83,817.92	83,817.92
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000219	A-C DIST HB WW		40,636.71	40,636.71
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000222	ADMIN DIST WIND WTR		305,098.69	305,098.69
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000223	CS DIST WIND WTR		228,673.48	228,673.48
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000224	A-C DIST WIND WTR		110,865.76	110,865.76
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000227	ADMIN DIST WIND WW		293,025.97	293,025.97
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000228	CS DIST WIND WW		219,624.90	219,624.90
Texas Utility Group Management	2000	SWWC Utilities, Inc	20000229	A-C DIST WIND WW		106,478.81	106,478.81

Texas Utility Group Management	2000 SWWC Utilities, Inc	20000232 ADMIN DIST FCUC WW	101,642.54	101,642.54	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000233 CS DIST FCUC WW	76,181.76	76,181.76	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000234 A-C DIST FCUC WW	36,934.53	36,934.53	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000237 ADMIN DIST HUNT	6,648.68	6,648.68	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000238 CS DIST HUNT	4,983.22	4,983.22	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000239 A-C DIST HUNT	2,415.97	2,415.97	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000242 ADMIN DIST INV	6,662.10	6,662.10	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000243 CS DIST INV	4,993.29	4,993.29	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000244 A-C DIST INV	2,420.85	2,420.85	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000247 ADMIN DIST MDTX WTR	5,558.84	5,558.84	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000248 CS DIST MDTX WTR	4,166.39	4,166.39	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000249 A-C DIST MDTX WTR	2,019.95	2,019.95	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000252 ADMIN DIST MDTX WW	5,166.79	5,166.79	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000253 CS DIST MDTX WW	3,872.54	3,872.54	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000254 A-C DIST MDTX WW	1,877.49	1,877.49	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000257 ADMIN DIST SWU	2,568.22	2,568.22	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000258 CS DIST SWU	1,924.90	1,924.90	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000259 A-C DIST SWU	933.24	933.24	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000262 ADMIN DIST TK WTR	14,909.93	14,909.93	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000263 CS DIST TK WTR	11,175.09	11,175.09	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000264 A-C DIST TK WTR	5,417.92	5,417.92	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000267 ADMIN DIST TK WW	13,270.52	13,270.52	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000268 CS DIST TK WW	9,946.34	9,946.34	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000269 A-C DIST TK WW	4,822.20	4,822.20	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000900 FSC (Finance/Acctg)	(652,522.08)	(652,522.08)	
Texas Utility Group Management	2000 SWWC Utilities, Inc	20000903 IT	(297,225.43)	(297,225.43)	
Texas Utility Group Management	3020 Monarch Utilities I, LP	30200302 ADMIN DIST MON WTR	1,226,858.01	1,226,858.01	
Texas Utility Group Management	3020 Monarch Utilities I, LP	30200303 CS DIST MON WTR	919,538.19	919,538.19	
Texas Utility Group Management	3020 Monarch Utilities I, LP	30200304 A-C DIST MON WTR	445,811.62	445,811.62	
Texas Utility Group Management	3020 Monarch Utilities I, LP	30200313 ADMIN DIST MON WW	194,308.04	194,308.04	
Texas Utility Group Management	3020 Monarch Utilities I, LP	30200314 CS DIST MON WW	145,635.16	145,635.16	
Texas Utility Group Management	3020 Monarch Utilities I, LP	30200315 A-C DIST MON WW	70,607.01	70,607.01	
Texas Utility Group Management	5010 Metro-H2O, Ltd.	50100051 ADMIN DIST METRO	61,903.41	61,903.41	
Texas Utility Group Management	5010 Metro-H2O, Ltd.	50100052 CS DIST METRO	46,397.03	46,397.03	
Texas Utility Group Management	5010 Metro-H2O, Ltd.	50100053 A-C DIST METRO	22,494.25	22,494.25	
Texas Utility Group Management Total			(5,522,383.86)	5,522,383.86	0.00
West Shared	2000 SWWC Utilities, Inc	20000201 WEST MGMT	(816,487.99)		(816,487.99)
West Shared	2000 SWWC Utilities, Inc	20000205 WEST DIST DIA	26,413.38		26,413.38
West Shared	2000 SWWC Utilities, Inc	20000210 WEST DIST WS	62,787.93		62,787.93
West Shared	2000 SWWC Utilities, Inc	20000215 WEST DIST HB WTR	68,789.11		68,789.11
West Shared	2000 SWWC Utilities, Inc	20000220 WEST DIST HB WW	66,911.19		66,911.19
West Shared	2000 SWWC Utilities, Inc	20000225 WEST DIST WIND WTR	182,444.24		182,444.24
West Shared	2000 SWWC Utilities, Inc	20000230 WEST DIST WIND WW	175,259.15		175,259.15
West Shared	2000 SWWC Utilities, Inc	20000235 WEST DIST FCUC WW	60,787.53		60,787.53
West Shared	2000 SWWC Utilities, Inc	20000240 WEST DIST HUNT	4,000.79		4,000.79
West Shared	2000 SWWC Utilities, Inc	20000245 WEST DIST INV	4,041.62		4,041.62
West Shared	2000 SWWC Utilities, Inc	20000250 WEST DIST MDTX WTR	3,306.78		3,306.78
West Shared	2000 SWWC Utilities, Inc	20000255 WEST DIST MDTX WW	3,021.00		3,021.00
West Shared	3020 Monarch Utilities I, LP	30200310 WEST DIST MON WTR	117,206.85		117,206.85
West Shared	3020 Monarch Utilities I, LP	30200321 WEST DIST MON WW	4,409.04		4,409.04
West Shared	5010 Metro-H2O, Ltd.	50100054 WEST DIST METRO	37,109.38		37,109.38
West Shared Total			(816,487.99)	816,487.99	0.00
Grand Total			(14,013,803.43)	14,013,803.43	0.00

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**OPUC RFI 1-19:** Provide a detailed explanation of the Bonus Expense – Other amount of \$21,371.49 shown on WP II-D-9.1.a.8. What does this amount relate to and how was it computed as a “Sum of Normalized”? Also provide an explanation as to why the adjusted amount for this account’s expense is significantly greater than the prior years’ amounts provided.

**AMENDED  
RESPONSE:** See Amended Confidential Attachments OPUC 1-19 and 1-20 for detailed explanations.

Prepared by: Edward Taussig  
Sponsored by: Carmelitha Bordelon-Taylor

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**OPUC RFI 1-20:** Admit or deny that the Bonus Expense – Other amount of \$21,371.49 shown on WP II-D-9.1.a.8 is in addition to any STI pay awarded during the test year. If admitted, provide the amount given in these types of bonuses for the last three years period. If denied, provide an explanation as to why it is booked into this account.

**AMENDED  
RESPONSE:** See Amended Confidential Attachments OPUC 1-19 and 1-20 for detailed explanations.

Prepared by: Edward Taussig  
Sponsored by: Carmelitha Bordelon-Taylor

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**OPUC RFI 1-26: Please provide any Cost Allocation Manuals used by Southwest Water and/or its affiliates which identify and discuss the allocation of costs.**

**RESPONSE:** Please see Errata Schedule IV-4.1 – Cost Allocation Manual, contained in the rate filing package.

Prepared by: Carmelitha Bordelon-Taylor  
Sponsored by: Robert Kelly

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**OPUC RFI 1-27:** Referencing the testimony of Carmelitha Bordelon-Taylor, Page 9, Lines 17-21, for each adjustment made to Test Year per books expense to remove, recast, or reinstate expenses, please provide a summary schedule stating the reason for said adjustment and the amount, by NARUC account, of the adjustment.

**AMENDED  
RESPONSE:**

Please see Errata Workpapers WP/II-A-2 and WP/II-A-3 for details by NARUC account of pro-forma adjustments made to the test year for the requested information.

Prepared by: Carmelitha Bordelon-Taylor  
Sponsored by: Carmelitha Bordelon-Taylor

