

Control Number: 45570



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SOAH DOCKET NO. 473-16-2873.WS RECEIVED
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2016 JUN 27 PM 2:38

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

STATE OFFICE OF
PUBLIC UTILITY COMMISSION
FILING CLERK

ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S TENTH REQUEST
FOR INFORMATION TO MONARCH UTILITIES I, LP
STAFF NOS. 10-1 THROUGH NO. 10-5**

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 Tenth 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

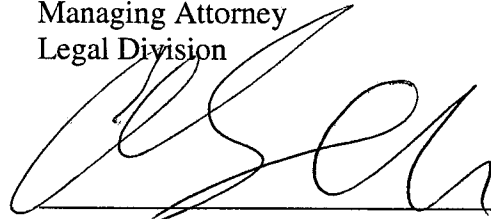
211

Date: June 27, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director
Legal Division

Stephen Mack
Managing Attorney
Legal Division

A handwritten signature in black ink, appearing to read 'A.J. Smullen', written over a horizontal line.

A.J. Smullen
State Bar No. 24083881
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Sam Chang
State Bar No. 24078333
Attorney, Legal Division
sam.chang@puc.texas.gov

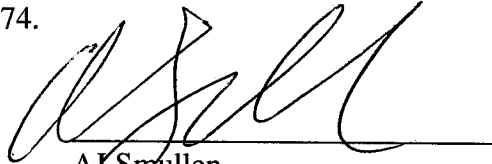
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78712-3326
(512) 936-7289
(512) 936-7268 (facsimile)
sam.chang@puc.texas.gov

*Commission Staff of the Public Utility
Commission of Texas*

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on June 27, 2016
in accordance with 16 Tex. Admin. Code § 22.74.



AJ Smullen

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INSTRUCTIONS

1. Monarch Utilities' responses to Staff's 10th 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 10th 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 10th 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

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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.

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- Staff 10-1 Provide a reconciliation that (1) starts with the beginning balances for original cost, annual depreciation expense, accumulated depreciation and net plant that were set as Monarch's rate base in 2002, to (2) the ending balances of these amounts as of June 30, 2015, per Earl Robinson's testimony and supporting schedules. In responding, please provide the following:
- a. Please include all water and sewer asset retirements since rate base was set in 2002.
 - b. For each individual asset retired, include the date each asset was removed from service, all adjusting journal entries, the service life for each asset at the time of retirement and the reason the asset was removed from service.
 - c. Also include all water and sewer asset additions since rate base was set in 2002.
 - d. For each individual asset added, include the date each asset was added to service, all adjusting journal entries, the service life assigned to each asset at the time of addition. Identify if the added asset is a replacement and specify the replaced asset.
- Staff 10-2 Confirm or deny that retired assets are included in Bret Fenner's Attachment BWF-2. If you are unable to confirm, please explain in detail, including by identifying any retired assets that are included in Attachment BWF-2.
- Staff 10-3 Confirm or deny that assets, which were transferred with Blue Mound and no longer owned by Monarch, are included in Bret Fenner's Attachment BWF-2. If you are unable to confirm, please explain in detail, including by identifying any transferred assets that are included in Attachment BWF-2.
- Staff 10-4 Confirm or deny that assets which were transferred with Blue Mound and Midway and no longer owned by Monarch, are included in Earl Robinson's depreciation reports, Schedules II-1.4(W) and II-1.4(S). If you are unable to confirm, please explain in detail, including by identifying any transferred assets that are included in Earl Robinson's depreciation reports, Schedules II-1.4(W) and II-1.4(S).
- Staff 10-5 For the photographs included in Bret Fenner's testimony, provide a label for each photograph identifying the asset is being verified.