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

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

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STATE OFFICE OF PUBLIC UTILITY COMMISSION
FILING CLERK
ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S
ELEVENTH REQUEST FOR INFORMATION TO MONARCH UTILITIES I, LP
STAFF NO. 11-1 THROUGH NO. 11-5**

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 Eleventh 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 78711-3326

225

Date: July 8, 2016

**PUBLIC UTILITY COMMISSION OF
TEXAS LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director
Legal Division

Stephen Mack
Managing Attorney
Legal Division

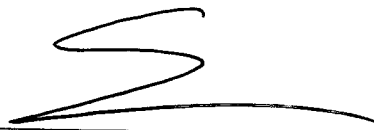


Sam Chang
State Bar No. 24078333
AJ Smullen
State Bar No. 24083881
Ericka Garcia
State Bar No. 24092077
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78711-3326
(512) 936-7290
(512) 936-7268 (facsimile)

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on March 28, 2016, in accordance with 16 Tex. Admin. Code § 22.74.



Sam Chang

**COMMISSION STAFF'S
ELEVENTH REQUEST FOR INFORMATION TO MONARCH UTILITIES I, LP
STAFF NO. 11-1 THROUGH NO. 11-5**

INSTRUCTIONS

1. Monarch Utilities' responses to Staff's 11th 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 11th 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 11th 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
12. Documents produced in response to Staff’s 11th RFI shall be Bates labeled.

**COMMISSION STAFF'S
ELEVENTH REQUEST FOR INFORMATION TO MONARCH UTILITIES I, LP
STAFF NO. 11-1 THROUGH NO. 11-5**

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.

**COMMISSION STAFF'S
ELEVENTH REQUEST FOR INFORMATION TO MONARCH UTILITIES I, LP
STAFF NO. 11-1 THROUGH NO. 11-5**

**STAFF RFI
NO. 11-1**

For Account 331.40 Water Lines, provide more detailed information.

- a. How were the Transmission and Distribution mains constructed?
- b. What is the current condition of the water lines?
- c. Once water lines are retired, are they abandoned in place or is there an actual removal cost?
- d. What is the basis for selecting a -30% future net salvage?

**STAFF RFI
NO. 11-2**

For Account 304.20 Pumping Structures & Improvements, provide more detailed information. What is your basis for the cost of removal of -10%?

**STAFF RFI
NO. 11-3**

For Account 307.20 Wells and Springs, provide a more detailed analysis of the selection of -25% for cost of removal. Once the Wells are retired, are they abandoned in place or is there an actual removal cost?

**STAFF RFI
NO. 11-4**

For Account 360.20 Sewer Lines, provide more detailed information.

- a. How were the Sewer Mains constructed?
- b. What is the current condition of the sewer lines?
- c. Once the sewer lines are retired, are they abandoned in place or is there an actual removal cost?
- d. What is the basis for selecting a -5% future net salvage?

**STAFF RFI
NO. 11-5**

Explain the origin of information from industry studies.

- a. What resource was used to find this information?
- b. Why were those particular companies selected within the water industry?
- c. How are these companies similar to Monarch Utilities?