



Control Number: 45570



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

RECEIVED

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

STATE OFFICE OF
PUBLIC UTILITY COMMISSION
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COMMISSION STAFF'S
FIFTEENTH REQUEST FOR INFORMATION TO MONARCH UTILITIES I, LP
STAFF NO. 15-1

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 Fifteenth 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

233

Date: July 15, 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 July 15, 2016,
in accordance with 16 Tex. Admin. Code § 22.74.



Sam Chang

**COMMISSION STAFF'S
FIFTEENTH REQUEST FOR INFORMATION TO MONARCH UTILITIES I, LP
STAFF NO. 15-1**

INSTRUCTIONS

1. Monarch Utilities' responses to Staff's 15th 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 15th 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 15th 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 15th RFI shall be Bates labeled.

**COMMISSION STAFF'S
FIFTEENTH REQUEST FOR INFORMATION TO MONARCH UTILITIES I, LP
STAFF NO. 15-1**

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.

**COMMISSION STAFF'S
FIFTEENTH REQUEST FOR INFORMATION TO MONARCH UTILITIES I, LP
STAFF NO. 15-1**

**STAFF RFI
NO. 15-1**

Refer to Errata – Schedule II-D-9.1.f, Payroll Detail – *Test Year vs. Requested Reconciliation* sponsored by Carmelitha Bordelon-Taylor. The schedule indicates and head count of the 137 full headcount FTE Texas Utilities. With regard to the 137 headcount, please provide the following:

- a. The number of direct employees that work for Monarch Utilities I, L.P., TX Utility Group, SWWC Utilities, Inc., and other utilities but not limited to Windermere, Hornsby Bend, Diamond, Water Services, Mid-Tex, Huntington, Inverness, SWUT, Metro, and Tenkiller for June 30, 2015 and June 30, 2016.
- b. The number of employees that work for more than one utility company and the specific utilities that employ such employees.
- c. The job titles and position of the employees listed in response to Staff RFI No. 15-1(a) and (b).