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SOAH DOCKET NO. 473-16-2873.WS

PUC DOCKET NO. 45520

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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 PUBLIC UTILITY COMMISSION FILING CLERK ADMINISTRATIVE HEARINGS

MONARCH UTILITIES I, L.P.'S RESPONSE TO SOAH ORDER NO. 8

In SOAH Order No. 8, the Administrative Law Judges ("ALJ") ordered Monarch Utilities I, L.P., ("Monarch") to provide a detailed explanation as to why each and every reference in the testimonies of Office of Public Utility Counsel ("OPUC") witness Chris Ekrut and the Staff of the Public Utility Commission of Texas witness Leila C. Guerrero should be treated as confidential material. Monarch files its Response to SOAH Order No. 8 and in support respectfully shows the following:

Testimony & Workpapers of OPUC Witness Chris Ekrut

Testimony of Chris Ekrut	Monarch has no objection to the currently redacted portions of the written direct testimony of OPUC witness Chris Ekrut being un-redacted and classified as non-confidential.
Confidential Schedules CDE-6 and CDE-7	Monarch has no objection to these schedules being classified as non-confidential.
Ekrut Workpapers – Monarch Responses to OPUC RFIs 1-5, 1-19, and 1-20	Monarch requests that these responses remain confidential. The responses to the OPUC RFIs 1-5, 1-19, and 1-20 all constitute competitive salary and incentive compensation data, which if made public would hinder Monarch's ability to remain competitive in attracting new employees in an increasingly competitive job market.
Monarch Response to OPUC RFI 1-5	Monarch's response to OPUC RFI 1-5 contains confidential Attachment OPUC 1-5 that includes corporate minutes, emails, and documents that discuss and provide compensation information on an individual employee basis without their consent, and should remain confidential. Monarch requests that their information remain confidential.

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<p>Monarch Responses to OPUC RFI 1-19</p>	<p>Monarch's response to OPUC RFIs 1-19 describes the incentive compensation amount for SouthWest Water Company's Regulatory Group. This group consists of very few employees and only two individuals who receive incentive compensation. Providing the information in response to these RFIs would expose compensation for these employees. Monarch requests that this information remain confidential.</p>
<p>Monarch Responses to OPUC RFI 1-20</p>	<p>Monarch's responses to OPUC RFI 1-20 describe the incentive compensation amount for SouthWest Water Company's Regulatory Group. This group consists of very few employees and only two individuals who receive incentive compensation. Providing the information in response to these RFIs would expose compensation for these employees. Monarch requests that this information remain confidential.</p>
<p>Ekrut Workpapers – Monarch Response to OPUC RFI 2-11</p>	<p>Monarch's response to this RFI shows a history of distributions paid by SouthWest Water Company. During 2010, SouthWest Water Company became a private company and its financial information is not publicly available. Additionally, SouthWest Water Company has operating companies other than Monarch. Monarch has stated that Monarch did not pay dividends to its parent. Providing this information would unnecessarily expose a detail of distributions to the SouthWest Water Company shareholder, which is not publicly available. Monarch requests that this information remain confidential.</p>

**Testimony & Workpapers of Staff Witness Leila C. Guerrero**

Testimony of Leila C. Guerrero	Monarch has no objection to the currently redacted portions of the direct testimony of Staff witness Leila Guerrero being un-redacted and classified as non-confidential.
Confidential Workpapers LG-4, LG-5, LG-6, LG-7, and LG-8	Monarch has no objection to classifying these workpapers as non-confidential.
Confidential Workpapers LG-1, LG-2, LG-3, and LG-9	Monarch requests that these workpapers remain confidential. These items constitute competitive salary and incentive compensation data, which if made public would hinder Monarch's ability to remain competitive in attracting new employees in an increasingly competitive job market, as well as make public certain individual salary information of current and former employees of Monarch and SouthWest Water Company without their consent.
Confidential Workpaper LG-10	Monarch requests that this workpaper remain confidential. This item identifies individual Monarch employees by name, without their consent, and should remain confidential.

Respectfully submitted;

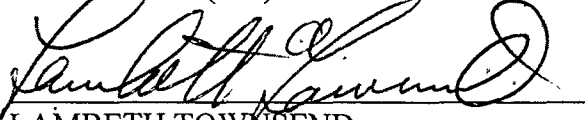
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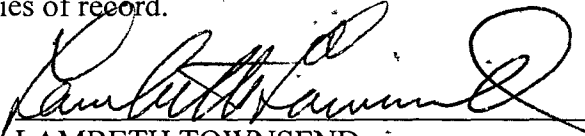
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ATTORNEYS FOR MONARCH UTILITIES I, LP

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of September, 2016, a true and correct copy of the foregoing document has been sent via e-mail, facsimile, certified mail, return receipt requested, first class mail, or hand-delivered to all parties of record.



LAMBETH TOWNSEND