



Control Number: 45570



Item Number: 311

Addendum StartPage: 0

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

RECEIVED

2016 SEP -2 PM 2:03

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

STATE OFFICE OF PUBLIC UTILITY COMMISSION  
FILING CLERK

ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S NINETEENTH REQUEST  
FOR INFORMATION TO MONARCH UTILITIES I, LP  
STAFF NOS. 19-1 THROUGH 19-5**

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 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

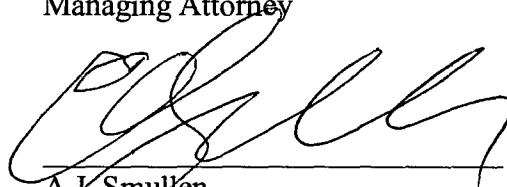
Date: September 2, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Stephen Mack  
Managing Attorney

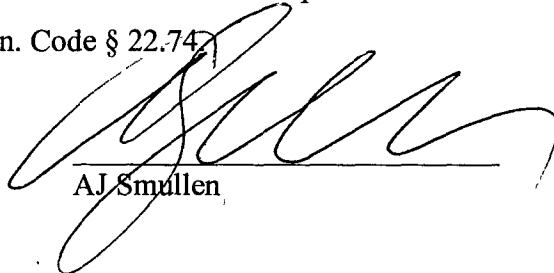


A.J. Smullen  
State Bar No. 24083881  
(512) 936-7289  
Sam Chang  
State Bar No. 24078333  
1701 N. Congress Avenue  
Austin, Texas 78712-3326  
(512) 936-7268 (facsimile)

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

**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties of record on September 2, 2016 in accordance with 16 Tex. Admin. Code § 22.74.



AJ Smullen

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

**COMMISSION STAFF'S NINETEENTH REQUEST  
FOR INFORMATION TO MONARCH UTILITIES I, LP  
STAFF NOS. 19-1 THROUGH 19-5**

**INSTRUCTIONS**

1. Monarch Utilities' responses to Staff's 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 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 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

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

**COMMISSION STAFF'S NINETEENTH REQUEST  
FOR INFORMATION TO MONARCH UTILITIES I, LP  
STAFF NOS. 19-1 THROUGH 19-5**

**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.

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

**COMMISSION STAFF'S NINETEENTH REQUEST  
FOR INFORMATION TO MONARCH UTILITIES I, LP  
STAFF NOS. 19-1 THROUGH 19-5**

- Staff 19-1 Please refer to Mr. Robinson's rebuttal testimony at 22:3–10. For the last 10 years, for each instance of the retirement of a water main or a portion of a water main, please state the number of linear feet of equipment per instance. Of this figure, please also provide the number of linear feet that were retired because they were replaced or repaired and the number of linear feet that were retired because the main was removed from service with no replacement installed.
- Staff 19-2 With respect to the previous request. Please state the average cost of removal of plant removed from service and not replaced or repaired.
- Staff 19-3 Please refer to Mr. Robinson's rebuttal testimony at 12:16–13:2. Does Mr. Robinson believe the Broad Group Procedure is commonly used by Texas utilities? If so, please explain the basis for Mr. Robinson's belief.
- Staff 19-4 Please refer to Mr. Robinson's rebuttal testimony at 19:14–18. Please identify the account number and net balance of
- a) each account with proposed service lives based on Monarch's historical data without relying on any industry comparisons, and
  - b) each accounts with proposed service lives developed without the use of any of Monarch's historical data.
- Staff 19-5 Reference Paul Moul's Workpapers, WP-PRM-2R, AUS Monthly Utility Reports. Provide the full report. Also, provide the most recent full report available to Mr. Moul.