

Control Number: 45570



Item Number: 314

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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 TWENTIETH REQUEST  
FOR INFORMATION TO MONARCH UTILITIES I, LP  
STAFF NOS. 20-1 THROUGH 20-6**

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

314

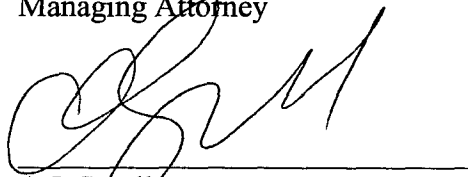
Date: September 2, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Stephen Mack  
Managing Attorney




A.J. Smullen  
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(512) 936-7289  
Sam Chang  
State Bar No. 24078333  
1701 N. Congress Avenue  
Austin, Texas 78712-3326  
(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 September 2, 2016 in accordance with 16 Tex. Admin. Code § 22.74.

  
AJ Smullen

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STAFF NOS: 20-1 THROUGH 20-6**

**INSTRUCTIONS**

1. Monarch Utilities' responses to Staff's RFI shall be provided within the time limit provided by the presiding officer.
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

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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 20-1 Referring to Attachment CDG-1R, please confirm that the assets subject to the proposed disallowances reflected in Attachment HG-4 can be identified with particularity using the Cost Center, Cost Center Description, Capitalized on (Acquired Date), Claimed Economic Life, and Monarch Total (Claimed Orig. Cost) columns. Please also confirm that the original cost for each disallowed asset in Attachment HG-4 corresponds to the original cost for that asset as matched using the five columns identified above.
- Staff 20-2 Please refer to Mr. Gott's rebuttal testimony at 5:17–6:9. Provide the basis of Mr. Gott's knowledge that Monarch or TECON have repaid each developer the contributed capital for each capital item identified as "CIAC/Advance."
- Staff 20-3 Refer to Staff 20-2. Please provide any documents that substantiate, evidence, or otherwise show that Monarch or TECON has repaid each developer the contributed capital for each capital item identified as "CIAC/Advance." If the response to this request is voluminous, please provide a non-voluminous representative sample of the responsive documents in your possession.
- Staff 20-4 Please refer to Mr. Gott's rebuttal testimony beginning at 10:2. Please identify whether the following capitalized items reflect tangible or intangible property:
- a. Public Utilities Service Agreement with the City of Pottsboro,
  - b. Re-work Stainless steel headers SO#953601,
  - c. WWTP Engineering Evaluation; PINP/Arrowhead/SP, and
  - d. any items described as "Test Hydro Tank"
- Staff 20-4 Please refer to Mr. Gott's rebuttal testimony beginning at 10:2. Please identify any physical or tangible plant used and useful in providing utility service that comprises the capitalized cost for the following. In responding, please provide the original cost of the physical or tangible plant component of the capitalized cost.
- a. Public Utilities Service Agreement with the City of Pottsboro,
  - b. Re-work Stainless steel headers SO#953601,
  - c. WWTP Engineering Evaluation; PINP/Arrowhead/SP
  - d. any items described as "Test Hydro Tank"
- Staff 20-5 Please refer to Mr. Gott's rebuttal testimony beginning at 10:2. Please identify what capital assets, if any, were placed into service as a result of the "WWTP Engineering Evaluation; PINP/Arrowhead/SP" expense.

Staff 20-6 Explain the difference between the description “new” tap, grinder or sewer pump and “replacement” tap, grinder or sewer pump listed in Response to OPUC 5-2.