



Control Number: 45627



Item Number: 28

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**P.U.C. DOCKET NO. 45627
SOAH DOCKET NO. 473-17-1318.WS**

RECEIVED

**APPLICATION OF CHARLES §
BRANCH DBA DOUCETTE WATER §
SYSTEM AND LAKESIDE WATER §
SUPPLY AND THOMAS AND DANASA §
RAWLS FOR SALE, TRANSFER, OR §
MERGER OF FACILITIES AND §
CERTIFICATE RIGHTS IN TYLER §
COUNTY §**

PUBLIC UTILITY
2016 DEC -8 PM 3:27
PUBLIC UTILITY COMMISSION
COMMISSION OF TEXAS
FILING CLERK

**COMMISSION STAFF'S
SECOND REQUEST FOR INFORMATION TO THOMAS AND DANASA RAWLS
STAFF NO. 2-1 THROUGH NO. 2-6**

To: Thomas and Danasa Rawls, 1430 County Road 2800, Colmesneil, Texas 75938

Pursuant to 16 Tex. Admin. Code § 22.144, Commission Staff of the Public Utility Commission of Texas requests that Thomas and Danasa Rawls provide responses and produce documents in response to Staff's Second 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

28

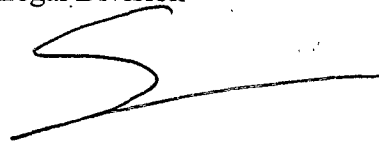
Date: December 8, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF
TEXAS LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director
Legal Division

Stephen Mack
Managing Attorney
Legal Division

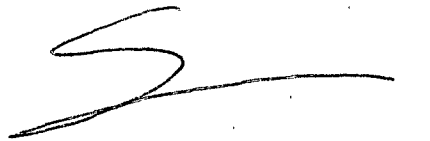


Sam Chang
State Bar No. 24078333
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7261
(512) 936-7268 (facsimile)

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on December 8, 2016, in accordance with 16 TAC § 22.74.



Sam Chang

**COMMISSION STAFF'S
SECOND REQUEST FOR INFORMATION TO THOMAS AND DANASA RAWLS
STAFF NO. 2-1 THROUGH NO. 2-6**

INSTRUCTIONS

1. Your responses to Staff's 2nd 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. Your responses to Staff's 2nd 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. You have a continuing duty to supplement its responses to Staff's 2nd 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. You shall amend your 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 2nd RFI shall be Bates labeled.

**COMMISSION STAFF'S
SECOND REQUEST FOR INFORMATION TO THOMAS AND DANASA RAWLS
STAFF NO. 2-1 THROUGH NO. 2-6**

DEFINITIONS

1. "Commission" means the Public Utility Commission of Texas.
2. "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.
3. "Electronically Stored Information" means data that is created, altered, communicated, and stored in digital form.

**COMMISSION STAFF'S
SECOND REQUEST FOR INFORMATION TO THOMAS AND DANASA RAWLS
STAFF NO. 2-1 THROUGH NO. 2-6**

- STAFF RFI
NO. 2-1** Provide your current (within the past 60 days) balance sheet (detailed assets and liabilities).
- STAFF RFI
NO. 2-2** Confirm that the total current cash available to you is \$169,000.
- STAFF RFI
NO. 2-3** Confirm that you will use the total current cash available to you of \$169,000 to pay the \$125,000 cash due at closing.
- STAFF RFI
NO. 2-4** Confirm that the remaining \$44,000 (\$169,000 - \$125,000) is available to cover any cash shortages in operating and maintenance expenses of the water utility for the next five years.
- STAFF RFI
NO. 2-5** Provide evidence of any other cash available to cover shortages in the next five years.
- STAFF RFI
NO. 2-6** Refer to the annual reports filed by Doucette Water System for the years 2013, 2014, and 2015. The average expense for these years is \$112,453, per year. Provide a detailed reconciliation of these historical expenses to your projections in the application that have projected expenses (prior to the interest expense) of \$29,500 in year one, \$34,300 in year two, \$32,300 in years three and four, and \$33,300 in year five. Provide explanations as to why the projected expenses are expected to be lesser than the expenses for the years 2013, 2014, and 2015.