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APPLICATION OF RIO CONCHO  
AVIATION, INC. FOR A  
RATE/TARIFF CHANGE

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BEFORE THE STATE OFFICE

PUBLIC UTILITY COMMISSION  
FILING CLERK

OF

ADMINISTRATIVE HEARINGS

**RIO CONCHO AVIATION, INC.'S FIRST AMENDED RESPONSE TO  
COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION  
QUESTION NOS. STAFF 4-9 AND 4-10**

COMES NOW, Rio Concho Aviation, Inc. ("Rio Concho") and files its First Amended Response to Commission Staff's Fourth Request for Information – Question Nos. Staff 4-9 and 4-10.

Respectfully submitted,

By: 

John J. Carlton  
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State Bar No. 03817600

ATTORNEY FOR RIO CONCHO AVIATION,  
INC.

**CERTIFICATE OF SERVICE**

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested to all parties on this the 11<sup>th</sup> day of October, 2016.

  
John Carlton

**REQUEST FOR INFORMATION  
QUESTION NOS. STAFF 4-9 AND 4-10**

**STAFF RFI 4-9.** Please provide totals for contract labor expense, salaries expense, and employee benefits for the years ending 12/31/2014, 12/31/2013, and 12/31/2012.

**OBJECTION:** Rio Concho objects to this request as irrelevant to this proceeding. The revenue requirement for this proceeding is based upon the 2015 test year as adjusted for known and measureable changes. The expenses that Rio Concho incurred in prior years is irrelevant to the determination of reasonableness of the requested revenue requirement based upon the 2015 test year.

**RESPONSE:** Please see the attached spreadsheet.

**Prepared by:** Barbie Brunson

**Sponsored by:** Barbie Brunson

**STAFF RFI 4-10:** Please explain in detail the reason for all changes in contract labor expense, salary expense, and employee benefit expense for Rio Concho for the years ending 12/31/2014, 12/31/2013, and 12/31/2012.

**OBJECTION:** Rio Concho objects to this request as irrelevant to this proceeding. The revenue requirement for this proceeding is based upon the 2015 test year as adjusted for known and measureable changes. The expenses that Rio Concho incurred in prior years is irrelevant to the determination of reasonableness of the requested revenue requirement based upon the 2015 test year.

**RESPONSE:**

**Salaries-**

In 2012 Barbie Brunson did not receive any salary. In 2013 Barbie Brunson received 48 paychecks and in 2014 Barbie Brunson received 49 paychecks.

**Contract Labor-**

**Meter Reading-** In 2012, Rio Concho paid \$100 a month for meter reading, in two months only \$50 was paid when Ms. Brunson helped train meter readers. In 2013, Rio Concho increased payments for meter reading to \$250 a month during the year in order to receive reliable help. In 2014, Ms. Brunson read the meters for the three of the months.

**Kevin Brunson-** In 2012, Mr. Brunson did not receive pay for contract labor. In 2013, Mr. Brunson started receiving contract labor compensation.

**Other Repairs-** Other repairs were contracted as needed for system maintenance.

**Mowing-** Varied as the number of times mowing was required.

See also, spreadsheets produced as confidential documents.

**Benefits-**

No benefits were paid in the years 2012, 2013 and 2014.

**Prepared by:** Barbie Brunson

**Sponsored by:** Barbie Brunson

Additional Information for Staff RFI 4-9

	2012	2013	2014
Meter Reading	1169	2000	1400
Kevin Brunson	0	14400	14400
Links Backhoe	1827	1635	1625
Concrete Cutters	378.88		
Mathis (concrete repair)		300	
Menuey (concrete repair)	250		
Amer. Leak detection	575		
Powers Plumbing	1250	585	
Randy Manus			511.5
Clayton Lowe			36
Althouse (mowing)	390	420	322.5
Totals	5839.88	19340	18295