



Control Number: 45720



Item Number: 133

Addendum StartPage: 0

RECEIVED

SOAH DOCKET NO. 473-16-3831.WS
PUC DOCKET NO. 45720

2016 NOV 15 AM 11:04

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

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§

BEFORE THE STATE OFFICE

PUBLIC UTILITY COMMISSION
HEARINGS

OF

ADMINISTRATIVE HEARINGS

**RIO CONCHO AVIATION, INC.'S SECOND SUPPLEMENTAL RESPONSE TO
COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
QUESTION NO. STAFF 4-1**

COMES NOW, Rio Concho Aviation, Inc. ("Rio Concho") and files its Second Supplemental Response to Commission Staff's Fourth Request for Information – Question No. Staff 4-1.

Respectfully submitted,

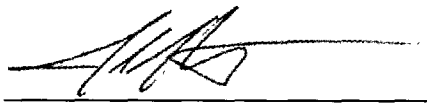
By: 

John J. Carlton
The Carlton Law Firm P.L.L.C.
2705 Bee Cave Road, Suite 200
Austin, Texas 78746
(512) 614-0901
Fax (512) 900-2855
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 15th day of November, 2016.



John Carlton

133

**REQUEST FOR INFORMATION
QUESTION NO. STAFF 4-1**

STAFF RFI 4-1. Please provide all detailed invoices for rate case expenses for which Rio Concho intends to request recovery. Please include hours spent, hourly rate, description of work performed, and the name of the person providing the services. Please also include invoices and descriptive backup documentation for any expenses charged on the invoices.

OBJECTION: Rio Concho objects to this request to the extent it seeks information protected by the Attorney Client privilege.

RESPONSE: Responsive non-privileged documents will be produced.



VALUESCOPE
Measure | Defend | Create

Invoice

Remit To:
1400 Thetford Ct.
Southlake, TX 76092
817.481.1150

| Date | Invoice # |
|-----------|-----------|
| 10/5/2016 | 7059 |

| Bill To |
|---|
| Rio Concho Aviation, Inc. c/o Mr. John J. Carlton 2705 Bee Cave Road, Suite 200 Austin, TX 78746 |

| Terms |
|-------------|
| Net 30 days |

| Item Code | Description | Amount |
|--|--|-------------------------|
| Professional Fees | Rio Concho Aviation, Inc. - Analysis and Expert Report | 5,000.00 |
| Misc. Expense | Research and Administrative Fee | 350.00 |
| We appreciate the opportunity to be of assistance. | | Total \$5,350.00 |

If you have any questions regarding this invoice, please contact your ValueScope, Inc. consultant.

RCA000964

Randal Manus
 7 Greenfield Lane
 Weatherford, TX 76087
 817-319-7094
 Fax 817-599-5540

Invoice

| DATE | INVOICE # |
|-----------|---------------|
| 10/6/2016 | 2016-10-06-01 |

| |
|---|
| BILL TO |
| Rio Concho Aviation Inc. 171 Aviator Drive Fort Worth, TX 76179 |

| | | P.O. NO. | TERMS | PROJECT |
|----------------|-----------|----------|--------------|----------|
| | | | 7 Days | |
| DESCRIPTION | | UNIT | RATE | AMOUNT |
| Rate Case 2015 | 10/6/2016 | 2.75 | \$ 30.00 | \$ 82.50 |
| THANK YOU | | | TOTAL | \$ 82.50 |

RCA000965

4



2705 Bee Cave Road, Suite 200
Austin, Texas 78746
Phone: 512-614-0901

INVOICE

Invoice # 3034
Date: 11/06/2016

Rio Concho Aviation, Inc.
221 West Hill Drive
Aledo, Texas 76008

0101 - Rio Concho Aviation, Inc. - Rate Application

Services

| Date | Attorney | Description | Quantity | Total |
|------------|----------|--|----------|----------|
| 10/03/2016 | JJC | Receive and review correspondence from B. Brunson regarding insurance issues. | 0.20 | \$65.00 |
| 10/04/2016 | ALL | Receive Staff's Response to RCA's Second and Third Request for Information; update discovery index and binder; update pleadings index and binder; prepare copies of documents for trial. | 1.80 | \$315.00 |
| 10/04/2016 | JJC | Preparation for hearing; Teleconference with G. Scheig regarding testimony; draft correspondence to B. Brunson regarding same; Receive and review reply; work regarding discovery supplementation; draft correspondence to B. Brunson regarding court reporter; prepare for hearing. | 2.80 | \$910.00 |
| 10/05/2016 | ALL | Revise and finalize Fourth Supplemental Response to Staff's First Request for Information; prepare copies of same and arrange delivery of same to PUC for filing; forward same to E. Garcia and S. Grace; receive SOAH Order No. 6; update pleadings, discovery and production index and binder; perform research for hearing. | 2.70 | \$472.50 |
| 10/05/2016 | JJC | Work regarding amended discovery responses per Order; Draft correspondence to B. Brunson regarding same; Teleconference with E. Garcia regarding discovery responses and hearing; draft correspondence to G. Scheig regarding Staff discovery responses; Receive and review reply. | 1.40 | \$455.00 |
| 10/06/2016 | ALL | Draft and finalize Supplemental Response to Staff's Fourth Request for Information; prepare copies of same; file same electronically with PUC; arrange delivery of same to PUC for filing; forward copy of same to E. Garcia and S. Grace; update index and binders for discovery and production; finalize Amended Response | 3.30 | \$577.50 |

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to Staff's Fourth Request for Information; prepare copies of same; prepared confidential filing.

| | | | | |
|------------|------|--|------|------------|
| 10/06/2016 | JJC | Receive and review correspondence from B. Brunson regarding amended discovery response; Teleconference with B. Brunson regarding hearing preparation and discovery response; work regarding Novak cross examination; review Novak and Scheig testimony; Receive and review correspondence from E. Garcia regarding response to Order No. 6; draft reply. | 3.20 | \$1,040.00 |
| 10/07/2016 | KANC | Telephone conference with and email correspondence to/from E. Garcia; review staff motion and SOAH order. | 0.50 | \$150.00 |
| 10/10/2016 | ALL | Receive and review correspondence from B. Brunson regarding hearing; draft response; receive Request to Postpone Hearing and SOAH Order No. 8 Granting Motion for Continuance; obtain copies of same from PUC exchange; calendar status report deadline. | 0.40 | \$70.00 |
| 10/11/2016 | ALL | Revise Amended Response to Staff's Fourth Request for Information; file same with PUC; send copy of same to E. Garcia and S. Grace. | 0.50 | \$87.50 |
| 10/11/2016 | JJC | Receive and review correspondence from E. Garcia regarding rescheduling hearing on merits; draft response; draft correspondence to B. Brunson regarding same; work regarding amended discovery responses. | 0.90 | \$292.50 |
| 10/12/2016 | JJC | Draft correspondence to B. Brunson regarding hearing schedule; Receive and review reply; draft correspondence to K. Brunson regarding same. | 0.40 | \$130.00 |
| 10/12/2016 | ALL | Receive invoice from ValueScope; forward same to B. Brunson. | 0.20 | \$35.00 |
| 10/13/2016 | JJC | Receive and review correspondence from E. Garcia regarding hearing schedule; draft response. | 0.30 | \$97.50 |
| 10/17/2016 | ALL | Receive and review SOAH Order 9 Setting New Hearing Date; forward same to B. Brunson, R. Manus and G. Scheig. | 0.20 | \$35.00 |
| 10/19/2016 | JJC | Teleconference with E. Garcia regarding exhibits and hearing postponement. | 0.30 | \$97.50 |
| 10/21/2016 | ALL | Re-order court reporter for new hearing date. | 0.20 | \$35.00 |
| 10/27/2016 | JJC | Work regarding supplemental discovery documents; research regarding rate suspension issue. | 0.50 | \$162.50 |

Services Subtotal \$5,027.50

Expenses

| Type | Date | Description | Quantity | Rate | Total |
|---------|------------|---|----------|---------|---------|
| Expense | 10/04/2016 | Copies (594 @ .10) | 1.00 | \$59.40 | \$59.40 |
| Expense | 10/19/2016 | Corporate Couriers 10.6.16 and 10.11.16 | 1.00 | \$68.48 | \$68.48 |

Expenses Subtotal **\$127.88**

| Time Keeper | Quantity | Rate | Total |
|---------------|----------|-----------------|-------------------|
| John Carlton | 10.0 | \$325.00 | \$3,250.00 |
| Kelli Carlton | 0.5 | \$300.00 | \$150.00 |
| Amy Loera | 9.3 | \$175.00 | \$1,627.50 |
| | | Subtotal | \$5,155.38 |
| | | Total | \$5,155.38 |

Statement of Account

| | | | |
|---------------------|--------------|-------------------|---------------------------------|
| Outstanding Balance | New Charges | Payments Received | Total Amount Outstanding |
| (\$28,568.49 | + \$5,155.38 |) - (\$0.00 |) = \$33,723.87 |

Detailed Statement of Account

Other Invoices

| Invoice Number | Due On | Amount Due | Payments Received | Balance Due |
|----------------|------------|-------------|-------------------|-------------|
| 2938 | 09/08/2016 | \$17,352.18 | \$10,172.18 | \$7,180.00 |
| 2981 | 10/05/2016 | \$21,388.49 | \$0.00 | \$21,388.49 |

Current Invoice

| Invoice Number | Due On | Amount Due | Payments Received | Balance Due |
|----------------|------------|---------------------------------|-------------------|--------------------|
| 3034 | 11/06/2016 | \$5,155.38 | \$0.00 | \$5,155.38 |
| | | Outstanding Balance | | \$33,723.87 |
| | | Total Amount Outstanding | | \$33,723.87 |

Please make all amounts payable to: The Carlton Law Firm, P.L.L.C.

Payment is due upon receipt. Please include invoice numbers as an additional reference so we may accurately identify and apply your payment. Thank you!

7X

Rio Concho Project

ValueScope, Inc.

| Date | Employee | Description | Hours | Rate | Fees |
|---|-------------|---|-------|----------|-------------------|
| 9/21/2016 | Greg Scheig | Reviewed Novak Report | 2.00 | \$395.00 | \$790.00 |
| 9/22/2016 | Mike Davis | Set up Models | 1.00 | \$290.00 | \$290.00 |
| 9/22/2016 | Greg Scheig | Began valuation analyses | 4.00 | \$395.00 | \$1,580.00 |
| 9/22/2016 | Sam Linder | Entering financials, updating guidelines, m&a screening | 5.00 | \$210.00 | \$1,050.00 |
| 9/23/2016 | Greg Scheig | Market research | 4.00 | \$395.00 | \$1,580.00 |
| 9/23/2016 | Sam Linder | Entering financials, updating guidelines, m&a screening | 1.00 | \$210.00 | \$210.00 |
| 9/25/2016 | Greg Scheig | Wrote draft report | 2.00 | \$395.00 | \$790.00 |
| 9/26/2016 | David Pryde | Math Check for Models | 1.25 | \$210.00 | \$262.50 |
| 9/26/2016 | Mike Conroy | Reviewed report | 0.50 | \$370.00 | \$185.00 |
| 9/26/2016 | Greg Scheig | Finalized Report | 1.00 | \$395.00 | \$395.00 |
| September Total | | | 21.75 | | \$7,132.50 |
| Less Adjustment to Fee Cap | | | | | -\$2,132.50 |
| September Professional Fees Billed | | | | | \$5,000.00 |
| 10/5/2016 | Greg Scheig | Novak Cross Questions | 1.50 | \$395.00 | \$592.50 |
| 10/6/2016 | Greg Scheig | Novak Cross Questions | 1.00 | \$395.00 | \$395.00 |
| 10/7/2016 | Greg Scheig | Novak Cross Questions | 1.00 | \$395.00 | \$395.00 |
| October Total | | | 3.50 | | \$1,382.50 |
| October Professional Fees Billed | | | | | \$1,382.50 |
| Total Professional Fees Billed to Date | | | | | \$6,382.50 |