



Control Number: 45720



Item Number: 35

Addendum StartPage: 0

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

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§

BEFORE THE STATE OFFICE ON  
FILING CLERK

OF

ADMINISTRATIVE HEARINGS

**RIO CONCHO AVIATION, INC.'S  
FIRST SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION  
QUESTION NOS. STAFF 1-5 AND STAFF 1-16**

COMES NOW, Rio Concho Aviation, Inc. ("Rio Concho") and files its First Supplemental Response to Commission Staff's First Request for Information – Question Nos. Staff 1-5 and Staff 1-16.

Respectfully submitted,

By: \_\_\_\_\_

John J. Carlton

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.

35

## **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 16<sup>th</sup> day of June, 2016.

A handwritten signature in black ink, appearing to read 'J. Carlton', is written over a horizontal line.

John Carlton

**REQUEST FOR INFORMATION  
QUESTION NOS. STAFF 1-5 AND 1-16**

**Staff - 1-5.** Please provide copies of detailed invoices and supporting documentation, including explanations and calculations for the test year and adjusted expenses included in Schedule I-1 of the application as follows:

- a) volume-related expenses, line 3, in the amount of \$1,620;
- b) employee labor, line 5, in the amount of \$41,568;
- c) contract labor, line 7, in the amount of \$26,987 and \$28,457;
- d) transportation expenses, line 8, in the amount of \$3,283 and \$3,971;
- e) employee pensions and benefits, line 13, in the amount of \$6,360 and \$13,788;
- f) office services & rentals, line 16, in the amount of \$6000;
- g) office supplies and expenses, line 17, in the amount of \$7,462;
- h) professional services, line 18, in the amount of \$719 and \$1,919;
- i) insurance, line 19, in the amount of \$2,542;
- j) regulatory (rate case) expense, line 21, in the amounts of \$227 and \$1,794 (responses to this request should be ongoing throughout the proceedings if an evidentiary hearing is required in the proceedings);
- k) miscellaneous expense, line 22, in the amount of \$7,459; and,
- l) taxes other than income, line 26, in the amount of \$4,660 and \$5,053.

**Response:** Responsive and non-privileged documents will be produced in accordance with the PUC procedures for Confidential Filings.

**Staff - 1-16.** Please provide copies of all income statements and balance sheets for any affiliated companies of the utility for 2013, 2014, and 2015. If the applicant's employees perform services for the affiliated companies, please indicate the percentage of allocation of time between the utility and the affiliated companies.

**Response:** Rio Concho objects to this request as it is partially related to the financial records that pre-date the test year used to establish the rates and the records of those years are irrelevant for this proceeding.

**Notwithstanding the foregoing objection, responsive and non-privileged documents will be produced in accordance with the PUC procedures for Confidential Filings.**