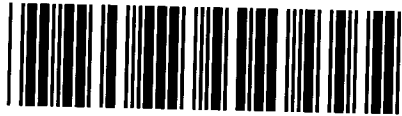


Control Number: 45720



Item Number: 38

Addendum StartPage: 0

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

RECEIVED

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

§
§
§
§

BEFORE THE STATE OFFICE

2016 JUN 21 PM 2:32
PUBLIC UTILITY COMMISSION
FILING CLERK

ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S REDACTED SECOND REQUEST FOR INFORMATION
TO RIO CONCHO AVIATION, INC.
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13

Pursuant to 16 Tex. Admin. Code § 22.144 (TAC) of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that the Rio Concho Aviation, Inc. by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78712-3326.

38

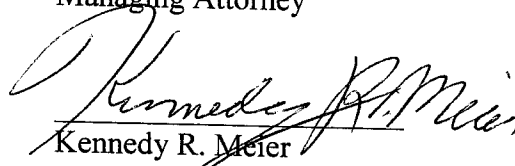
Dated: June 21, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Katherine Lengieza Gross
Managing Attorney

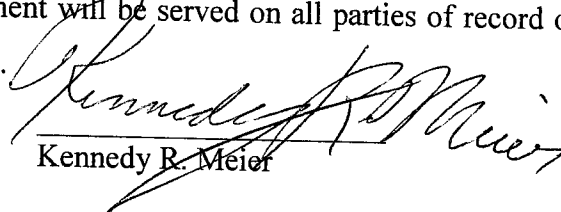


Kennedy R. Meier
State Bar No. 24092819
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78712-3326
(512) 936-7265
(512) 936-7268 (facsimile)

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

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on June 21, 2016, in accordance with 16 TAC § 22.74.


Kennedy R. Meier

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

**COMMISSION STAFF'S REDACTED SECOND REQUEST FOR INFORMATION
TO RIO CONCHO AVIATION, INC.
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13**

DEFINITIONS

- 1) "Rio Concho," "the Company" or "you" refers to the Rio Concho Aviation, Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, 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. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.

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

**COMMISSION STAFF'S REDACTED SECOND REQUEST FOR INFORMATION
TO RIO CONCHO AVIATION, INC.
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) 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.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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

**COMMISSION STAFF'S REDACTED SECOND REQUEST FOR INFORMATION
TO RIO CONCHO AVIATION, INC.
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13**

- Staff 2-1** Please provide a mileage log for Rio Concho Aviation utility travel or automobile expenses claimed in the cost of service, excluding all commuting miles. The log should include the beginning location and ending destination of each trip, all business purpose(s) of the trip, the name(s) of the specific person or people who traveled on the trip, and the total mileage of the trip.
- Staff 2-2** Please provide the distance in miles from the utility's office at the airport to each of the following:
[REDACTED]
b) The lab where samples are dropped off by the operator;
c) The post office used by the utility; and,
d) The bank used by the utility.
- Staff 2-3** Please provide the daily duties of Barbara Brunson, together with the number of hours each duty takes per day.
- Staff 2-4** Please provide the number of hours that Barbara Brunson spent in 2015 on rate case issues for PUC Docket No. 45720, PUC Docket No. 43728 and PUC Docket No. 45357, respectively.
- Staff 2-5** Please provide a description of Barbara Brunson's duties that are not included in the list of daily duties provided in response to Staff 2-3, together with the number of hours each duty takes per month.
- Staff 2-6** [REDACTED]
- Staff 2-7** [REDACTED]
- Staff 2-8** [REDACTED]

[REDACTED]

Staff 2-9

[REDACTED]

Staff 2-10

[REDACTED]

Staff 2-11

[REDACTED]

Staff 2-12

[REDACTED]

Staff 2-13

[REDACTED]