



Control Number: 45720



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

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

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

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

COMES NOW, Rio Concho Aviation, Inc. ("Rio Concho") and files its Response to Commission Staff's Redacted Second Request for Information – Question Nos. Staff 2-1 through Staff 2-13.

Respectfully submitted,

By: _____

John J. Carlton

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**ATTORNEY FOR RIO CONCHO AVIATION,
INC.**

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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 29th 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 1-1 THROUGH 1-22**

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.

Response: No responsive documents exist.

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.

Response: a) 36.5 miles.
b) 28.3 miles.
c) 38.6 miles.
d) 33.8 miles.

Response provided by Barbie Brunson.

Staff - 2-3. Please provide the daily duties of Barbara Brunson, together with the number of hours each duty takes per day.

Response: Check and reply to emails and messages. (1-2 hours) Enter water checks on computer and put together bank deposit. (1 hour) Plan out day's schedule. (30 min.) Make deposit as necessary. (30 min.) Pick up supplies as needed for daily activities. (2 hours) Drive to the airport. (45 min.) Check airport mailbox. (5 min.) Go to office and check drop box. (5 min.) Turn on office equipment. (5 min.) Get the golf cart and drive the taxiways for leaks. (45 min.) Go to well house. (5 min.) Check site tube, pressure tank, chlorine drum, chlorine pump, altitude gauge. Pump motors and booster pumps are functioning properly, check breakers in breaker panel. (30 min.) Air up the pressure tank if needed, make any

adjustments as needed. (1 hour) Make any repairs to the system that may be needed. (1-2 hours) Maintain records for utility operations. (30 min.) Be available for the rest of the day to respond to any customer service request or questions. (varies)

Response provided by Barbie Brunson.

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.

Response: No such records were kept. But Ms. Brunson estimates that she spent 80 hours on those matters.

Response provided by Barbie Brunson.

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.

Response: Flush mains as needed; 1-2 hours monthly

Take samples as needed; 20 minutes per sample. Most months are usually one sample.

Deliver samples to the lab as needed; 45 minutes per delivery to Tarrant County Health Dept. – one delivery per month usually.

Record Master meter reading; 20-25 minutes per month.

Install meters, backflows and boxes as needed; 1-2 hours per installation as needed. Estimated 1 installation per month on average.

Meet with state officials as needed for issues and inspections; 1-4 hours as needed. Estimate 1-2 hours per month on average.

Calculate and issue payroll checks; 1 hr-1 hr 15 min. monthly.

Calculate and file payroll taxes as required; 1 hour monthly

Calculate and file Texas Workforce Commission filings; 45 minutes quarterly and 15 minute per month averaged.

Calculate and file DLQR for water utility; 1 hour quarterly and 20 minutes per month averaged.

Calculate and file TCEQ Regulatory Assessment; 1 hour yearly and 20 minutes per month averaged.

Calculate and file Northern Trinity Groundwater Conservation District filings; 1 hour twice a year and 10 minutes per month averaged.

Calculate PUC Annual Report; 10 hours yearly and 1 ½ hour per month averaged.

Recheck water meter reading for customer as requested; 1 hour monthly

Shop electric rates for utility operations; 2 hours yearly and 30 minutes per month averaged.

Issue all disbursements as needed; 2 hours monthly

Reconcile bank accounts; 2 hours monthly

Enter invoices on QuickBooks; 6 hours monthly

Research and Contract with specialists as needed for utility projects; 1 hour monthly.

Monitor financials to determine if a rate change is warranted; 1 hour monthly.

Consult with accountants on financials; 30 minutes monthly

Take vehicle in for maintenance when required; 1 hour monthly.

Read the water meters as needed; 4 hours monthly

Enter meter readings into billing program; 4 hours monthly

Edit billing; 1 hour monthly

Print and mail invoices; 4 hours monthly

Email invoices; 15 min monthly

Calculate late invoices; 45 min monthly

Disconnect service to delinquent accounts; 30 min monthly

Be available to reconnect service upon payment; 1 hour monthly.

Set up transfer accounts for water customers; 45 minutes per new account and average one transfer account per month; 45 minutes monthly.

Set up new accounts for customers; 45 minutes per new account and average one new account per month; 45 minutes monthly..

Continuing Education courses; 16-18 hours yearly and 1-1 ½ hour per month averaged.

Response provided by Barbie Brunson.

Staff - 2-6.

[REDACTED]

Response:

[REDACTED]

Staff - 2-7.

[REDACTED]

Response:

[REDACTED]

[REDACTED]

Staff - 2-8.

[REDACTED]

[REDACTED]

Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Staff - 2-9. [REDACTED]
[REDACTED]

Response: [REDACTED]

Staff - 2-10. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Response: [REDACTED]
[REDACTED]

[REDACTED]

Staff - 2-11. [REDACTED]
[REDACTED]

Response: [REDACTED]

Staff - 2-12. [REDACTED]
[REDACTED]

Response: [REDACTED]

Staff - 2-13. [REDACTED]
[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

Response: [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]
[REDACTED]