

Control Number: 45720



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

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

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**BEFORE THE STATE OFFICE OF
PUBLIC UTILITY COMMISSION
FILING CLERK
ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO RIO CONCHO AVIATION, INC.
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-6**

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 78713-3326.

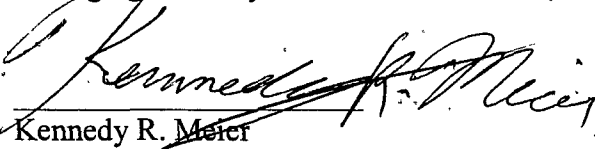
Dated: August 9, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Katherine Lengieza Gross
Managing Attorney

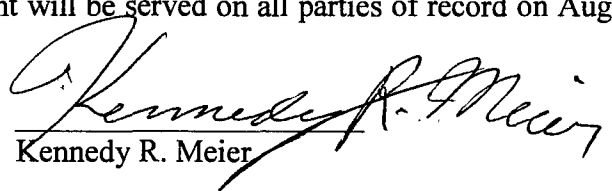


Kennedy R. Meier
State Bar No. 24092819
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78713-3326
(512) 936-7265
(512) 936-7268 (facsimile)

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on August 9, 2016, in accordance with 16 TAC § 22.74.


Kennedy R. Meier

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO RIO CONCHO AVIATION, INC.
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-6**

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.

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QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-6**

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.

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QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-6**

- Staff 3-1** Please provide monthly billing records for the test year. For each of Rio Concho's individual customer accounts, please include the amount of water used (in gallons) and the total amount billed. For each month, please indicate if any accounts were closed and/or opened.
- Staff 3-2** Please provide the number of unmetered taps within Rio Concho's water distribution system during the test year and indicate how these taps are used. In addition, please specify whether the restaurant lease and office lease are metered connections.
- Staff 3-3** Please provide monthly flushing records for the test year, as required by TCEQ regulations at 30 Tex. Admin. Code § 290.46(f)(3)(A)(v) (TAC). If available, please provide the number of gallons pumped for each flushing event.
- Staff 3-4** Please provide records of any customer complaints received during the test year, including the date, location, and nature of any complaints received by Rio Concho as required by TCEQ regulations at 30 TAC § 290.46(f)(3)(A)(iii).
a) For each record, please indicate if the complaint was received after-hours.
b) For each complaint response and resolution, please provide any logs for water system equipment and facilities maintenance and indicate who performed the maintenance.
- Staff 3-5** Please provide all other maintenance records for the water system and facilities, applicable to the test year, and as required by TCEQ regulations at 30 TAC § 290.46(f)(3)(A)(vi).
- Staff 3-6** Please clarify the use of the 1995 vehicle listed on line 15 of schedule III-3 of the application.