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PUC Docket 45720

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Application of Rio Concho
Aviation, Inc For A
Rate/Tarriiff Change

Before the State Office
Of
Administrative Hearings
PUBLIC UTILITY COMMISSION
FILING CLERK

RFI response to Docket 45720-59

REQUEST FOR DISCLOSURE NO. 194.2(i): The correct names of the parties to this action.

ANSWER:

Roy Geer

Stephen Grace

Jeffrey Sheets

REQUEST FOR DISCLOSURE NO. 194.2(c): The legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial).

ANSWER:

- 1) IRS Regulations
- 2) PUC Statutes
- 3) Confidential documents and testimony supplied by Rio Concho
- 4) Employee Benefit Trends

REQUEST FOR DISCLOSURE -NO.,194.2(e): The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each, identified person's connection with the case.

ANSWER:

Roy Geer 612 Aviator Dr, Ft Worth, Tx 76179 817-253-1795

It is obvious to even the most casual observer that Rio Concho water is simply using "expenses" as a method to extract income from Rio Concho water customers. After examining the financials provided by Rio Concho it appears the company can show a profit that well exceeds the PUC guidelines without an increase to the current rates. Rio Concho is over compensating its one employee with not only the salary for a part time job but also by providing a luxury automobile, a life insurance policy, medical insurance and a retirement annuity. These expenses are all well above what other small and many very large companies provide for their employees.

Stephen Grace 917 Aviator Dr, Ft Worth, Tx 76179 817-239-2432

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Rio Concho has again filed for a rate increase just a little more than a year after their last rate increase. The manufacturing of an increase in expenses to justify their proposed rate increase is not ethical. The claimed benefits that are optional employee-paid benefits in large companies, are being expensed 100% to the ratepayers without any employee contribution at Rio Concho, a one-person company. For all the water customers of Hicks Airfield, I request the PUC and the ALG to do their due diligence and investigate Rio Conchos expense claims and deny those that are out of line.

Jeffrey Sheets 598 Aviator Dr, Ft Worth, Tx 76179 817-488-5013

Rio Concho has filed 3 water rate increases in the last 3 years. If the full rate request is granted, revenue will increase by almost \$59,000 compared to 2013 water revenues or an increase of 63.3% with no increase in meters. Clearly their expenses have runaway. Salaries, benefits, affiliated transactions, capital expenditures, auto expenses and numerous other expenses must be reduced.

REQUEST FOR DISCLOSURE NO. 194.2(f): For any testifying expert:

- (i) the expert's name, address and telephone number;
- (ii) the subject matter on which the expert will testify;
- (iii) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information;
- (iv) if the expert is retained by, employed by, or otherwise subject to the control of the responding party:
 - (a) all documents, tangible things, reports, model, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
 - (b) the expert's current resume and bibliography

ANSWER:

None.

REQUEST FOR DISCLOSURE NO. 194.2(i): Any witness statements described in Rule 192.3(h).

ANSWER:

None.