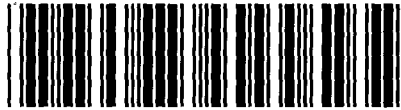


Control Number: 45720



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

RECEIVED

SEP -2 AM 9:40
PUBLIC UTILITY COMMISSION
FILING CLERK

APPLICATION OF RIO CONCHO § BEFORE THE STATE OFFICE
AVIATION, INC. FOR A § OF
RATE/TARIFF CHANGE § ADMINISTRATIVE HEARINGS

**RATEPAYERS FIRST REQUEST FOR INFORMATION
TO RIO CONCHO AVIATION, INC.
QUESTION NOS. RATEPAYERS 1-1 THROUGH 1-37**

Pursuant to 16 Tex. Admin. Code § 22.144 (TAC) of the Commission's Procedural Rules, the Ratepayers of Rio Concho 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
78711-3326.

Dated: Sept 1, 2016

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

RATEPAYER'S FIRST REQUEST FOR INFORMATION
TO RIO CONCHO AVIATION, INC.
QUESTION NOS. RATEPAYERS 1-1 THROUGH 1-37

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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**RATEPAYER'S FIRST REQUEST FOR INFORMATION
TO RIO CONCHO AVIATION, INC.
QUESTION NOS. RATEPAYERS 1-1 THROUGH 1-37**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Ratepayers request 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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**RATEPAYER'S FIRST REQUEST FOR INFORMATION
TO RIO CONCHO AVIATION, INC.
QUESTION NOS. RATEPAYERS 1-1 THROUGH 1-37**

Rio Concho Taxes

Ratepayers 1-1 Please provide Rio Concho tax returns for 2012, 2013, 2014 and 2015.

Vehicles

Ratepayers 1-2 Please list ALL vehicles that are used in any capacity for Rio Concho water in 2015.

Ratepayers 1-3 If more than the one vehicle is being used in answer 1-2, please list which vehicles incurred fuel-related expenses to Rio Concho water in 2015.

Ratepayers 1-4 If more than one vehicle is being used in answer 1-2, please list which vehicles incurred maintenance-related expenses to Rio Concho water in 2015.

Ratepayers 1-5 Please list which vehicles in answer 1-2 that require diesel fuel.

Ratepayers 1-6 Please list which vehicles in answer 1-2 use premium gasoline.

Ratepayers 1-7 Please list which vehicles in answer 1-2 use regular gasoline.

Ratepayers 1-8 Please provide the agreement with the PUC Staff from the 2014 rate case in which Rio Concho is allowed to expense 60% of their vehicle costs.

Ratepayers 1-9 Please provide a justification for including the Audi Connect expenses.

Airport Office

Ratepayers 1-10 Please list the date that the airport water office was opened in 2014.

Ratepayers 1-11 Please list the date at which Rio Concho first signed a lease for an airport office.

Ratepayers 1-12 Please list the date that the airport office air conditioner was operational.

Ratepayers 1-13 Please list the date that Rio Concho water company notified its water customers that an airport office was opened.

- Ratepayers 1-14 Please list the office hours of the airport water office.
- Ratepayers 1-15 Please provide a date of the posting of the airport office hours.
- Ratepayers 1-16 Please list the date that the airport office drop box was installed.
- Ratepayers 1-17 Please list the date that Rio Concho water company notified its water customers that an airport drop box was available.
- Ratepayers 1-18 Please provide a detailed list of duties that are accomplished inside the airport office.
- Ratepayers 1-19 Please provide a reason for opening an airport office.

Airport Water Facilities

- Ratepayers 1-20 Please list all water facility components at 171 Aviator Dr. that are not contained within the fenced-in area on the SE corner of this property.
- Ratepayers 1-21 Please list the measurements (length and width) of the fenced-in area containing the water facility area at 171 Aviator Dr.
- Ratepayers 1-22 Please list the specific area of ramp paving that occurred in 2013 which is expensed to Rio Concho water.
- Ratepayers 1-23 Please explain how the answer in 1-22 is related to Rio Concho water.

Capital Expenditures

- Ratepayers 1-24 Please detail how the 2014 purchase of the TV and other related purchases on the same receipt are water company related or required.

Administrative

- Ratepayers 1-25 Please explain Rio Concho's method of retaining expense receipts for water company business.
- Ratepayers 1-26 Please explain how Kevin Brunson is paid monthly.
- Ratepayers 1-27 Please provide the names and total number of Rio Concho water customers that drove to your Aledo home water company office in 2015.
- Ratepayers 1-28 Please explain the extra weekly salary payments to Ms Brunson in 2015.

Ratepayers 1-29	Please explain why meter reading expenses should increase by 69% from 2015 to 2016
Ratepayers 1-30	Please provide a list of all water company related emergencies that Kevin Brunson responded to in 2015.
Ratepayers 1-31	Please explain why Rio Concho uses the Walmarts closest to the airport less than 25% of the time for the purchase of bleach.
Ratepayers 1-32	Please provide all receipts for water company related Costco and Sam's Club purchases in 2015.
Ratepayers 1-33	Please provide the attendance record for the Hicks Airport public water meeting which occurred on March 28, 2016.
Ratepayers 1-34	Please detail the specific software and cost purchased in 2015 that appear on the 2015 line of PUC Table III-3(a).

Statute 24.81

Ratepayers 1-35	Please provide a date in which Rio Concho asked for a waiver of PUC Statute 24.81.
Ratepayers 1-36	Please provide a date in which the PUC granted the waiver to PUC Statute 24.81
Ratepayers 1-37	Please provide the PUC document granting the waiver to PUC Statute 24.81.