



Control Number: 45720



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

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

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§  
§

**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**

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**RIO CONCHO AVIATION, INC.'S  
SECOND REQUEST FOR INFORMATION TO COMMISSION STAFF  
QUESTION NOS. RIO CONCHO 2-1 THROUGH 2-14.**

Pursuant to 16 Tex. Admin. Code § 22.144 (TAC) of the Commission's Procedural Rules, Rio Concho Aviation, Inc. ("Rio Concho") requests that the Staff of the Public Utility Commission of Texas ("Staff") 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.

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 13<sup>th</sup> day of September, 2016.

A handwritten signature in black ink, appearing to read 'J. Carlton', is written over a horizontal line.

John Carlton

**RIO CONCHO AVIATION, INC.'S  
SECOND REQUEST FOR INFORMATION TO COMMISSION STAFF  
QUESTION NOS. RIO CONCHO 2-1 THROUGH 2-14**

**DEFINITIONS**

- 1) "Commission Staff," "Staff" or "you" refers to the Public Utility Commission and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "Contested Application" includes any application for a utility rate increase for which a hearing is conducted or testimony is filed by parties opposing the amount of the rate increase requested in the application.
- 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.

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Rio Concho 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) Rio Concho requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

**RIO CONCHO AVIATION, INC.'S  
SECOND REQUEST FOR INFORMATION TO COMMISSION STAFF  
QUESTION NOS. RIO CONCHO 2-1 THROUGH 2-14**

**RIO CONCHO RFI 2-1.** Please identify every application for a water or sewer rate increase for which Commission Staff has filed testimony regarding the reasonableness of rate case expenses since September 1, 2014.

**RIO CONCHO RFI 2-2.** Please identify every application for a water or sewer rate increase for which Commission Staff has filed testimony recommending approval of rate case expenses since September 1, 2014.

**RIO CONCHO RFI 2-3.** Please identify every contested application for a water or sewer rate increase for which Commission Staff has filed testimony regarding the reasonableness of rate case expenses since September 1, 2014.

**RIO CONCHO RFI 2-4.** Please identify every contested application for a water or sewer rate increase for which Commission Staff has filed testimony recommending approval of rate case expenses since September 1, 2014.

**RIO CONCHO RFI 2-5.** Please identify every application for a water or sewer rate increase for which Commission Staff has filed testimony recommending approval of more than a 50% of the requested increase in revenue requirement since September 1, 2014.

**RIO CONCHO RFI 2-6.** Please identify every contested application for a water or sewer rate increase for which Commission Staff has filed testimony regarding the reasonableness of rate case expenses since September 1, 2014.

**RIO CONCHO RFI 2-7.** Please produce any documents related to the Commission's or Commission Staff's policy with respect to the treatment of rate case expenses in rate applications when the Commission has original jurisdiction over the rates.

**RIO CONCHO RFI 2-8.** Please produce any documents related to the Commission's or Commission Staff's policy with respect to the treatment of rate case expenses in water and sewer rate applications when the Commission has original jurisdiction over the rates.

**RIO CONCHO RFI 2-9.** Please produce any documents related to the Commission's or Commission Staff's policy with respect to evaluation of the revenue requirement in rate applications when the Commission has original jurisdiction over the rates.

**RIO CONCHO RFI 2-10.** Please produce any documents related to the Commission's or Commission Staff's policy with respect to evaluation of the revenue requirement in water and sewer rate applications when the Commission has original jurisdiction over the rates.

**RIO CONCHO RFI 2-11.** Please explain in detail how the "Eight Company Peer Group" and the "Eight Company Barometer Group" in exhibits AN-2 and AN-3 to Andrew Novak's prefiled testimony were selected, including but not limited to explanations about the similarity or differences with Rio Concho for the following:

- a. Number of Customers;
- b. Miles of pipe;
- c. Number of employees;
- d. Age of system; and
- e. Rate Base.

**RIO CONCHO RFI 2-12.** Please produce any documents reviewed or relied upon by Andrew Novak in preparing his prefiled testimony.

**RIO CONCHO RFI 2-13.** Please produce a resume or curriculum vitae for Andrew Novak.

**RIO CONCHO RFI 2-14.** Please describe in detail any specific training or education that Andrew Novak has received in determining rate of return for water and sewer utilities.